ATTACHMENT 2

SUN PETROLEUM PROD CO SPILLMH US EPA Region III

ER-WM-300: Rev. 12/88

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
Generators – Part A

TSD

3/26/90 9:00 AM

Date of inspection ___ ___ ___ Time start _____ Time finish 12:00 PM

Name of inspector James Davis

Company, installation name Sun Refining and Market Co., Inc.

Location Delaware Ave. and Green St., Marcus Hook

County Delaware Municipality Borough of Marcus Hook

Identification number PAD980550594

Name of responsible official Steve Martini

Title Environmental Manager

Mailing address P.O. Box 426, Marcus Hook, PA 19061

Area code and telephone number _____

Name of person interviewed Richard Ware

Title Senior Environmental Consultant

Mailing address *(if different from above)* same

Area code and telephone number (215) 447-1128

1. Current waste handling method:

a.	☒ On-site	☒ treatment,	☒ storage,	☐ disposal	☐ PBR
b.	☒ On-site	☐ use,	☐ reuse,	☒ recycle,	☒ reclaim
c.	☒ Off-site	☐ treatment,	☐ storage,	☒ disposal	
d.	☐ Off-site	☐ use,	☐ reuse,	☐ recycle,	☐ reclaim

2. Amount of hazardous waste produced:

a. ~24,924 kg./mo. ave. 1989

b. ~2,990,899 kg./yr. 1989

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D001	Safety-Kleen	West Chester, PA
"	Waste Conversions	Hatfield, PA
D002	Merichem	Houston, TX
D007	Waste Conversions	Hatfield, PA
F002	Safety-Kleen	West Chester, PA
K051	Environmental Services of OH	Oregon, OH

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
Generators – Part B

1—No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Compliance

Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.262
X				Hazardous waste determination, copies available	(b)
X				Identification number	(c)(1)
X				Hazardous waste shipments offered only to licensed transporters	(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site	(d)
X				PA manifest used for intrastate shipments	(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
X				Manifests filled out properly and completely	(e)(7)
X				Manifests routed properly and within time limits (7 days)	(e)(14) or (15)
	X			Proper U.S. DOT shipping containers or packages	(f)(1)(i)
	X			Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
	X			Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
		X		Placards offered to transporter	(f)(2)
	X			Wastes accumulated on-site for less than 90 days	(g)(1)(i)
	X			Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
	X			Containers managed in accordance with 75.265(q)(1)–(14)	(g)(1)(iii)
	X			Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
X				Records retained at designated location for 20 years	(h)
				Quarterly reports submitted to the Department	(i)
				Exception reporting procedures followed	(j)
	X			Hazardous waste disposal plan, if required	(l)
X				Spill reporting procedures followed	(m)(1)
X				Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
	X			Special requirements followed for international shipments	(o)
X				On the job or classroom personnel training program [75.265(f)]	(g)(1)(v)
	X			Drum accumulation area inspected weekly as per 75.265(q)(5) Not in use	(g)(1)(iii)
X				Tank [75.265(r)]	(g)(1)(ii)
X				Preparedness and Prevention procedures [75.265(h)]	(g)(1)(v)
X				Emergency procedures [75.265(i)]	(g)(1)(v)
X				Manifests legible (all copies)	(e)(17)

ER-WM-302: 8/87

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
TSD Facilities – Part A

Date of inspection 3/26/90 Time start 9:00 AM Time finish 12:00 PM

Name of inspector James A. Davis

Company, installation name Sun Refining and Marketing Co., Inc.

Location Delaware Ave. and Green St., Marcus Hook

County Delaware Municipality Borough of Marcus Hook

Identification number PAD980550594

Name of responsible official Steve Martini

Title Environmental Manager

Mailing address P.O. Box 426, Marcus Hook, PA 19061

Area code and telephone number

Name of person interviewed Richard Ware

Title Senior Environmental Consultant

Mailing address *(if different from above)* same

Area code and telephone number (215) 447-1178

1. Site characterization:

a.	☐ Treatment	☐ surface impoundments	☐ chemical	☐ physical	☐ biological
b.	☒ Storage	☒ containers	☒ tanks	☐ surface impoundments	☐ waste piles
c.	☐ Disposal	☐ land treatment	☐ landfill	☐ incineration	☐ thermal treatment
d.	☐ Use	☐ reuse	☐ recycle	☐ reclaim	

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number: D001, D002, D007 F002, K051

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☐ No

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
TSD Facilities – Part B

1–No Violation Observed 2–Not Applicable 3–Not Determined 4–Non-Compliance

Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.265
X				Part A permit application submitted.	(a)(2), (z)(2)
X				Identification number.	(b)
X				Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department.	(b)(1)
		X		Waste streams not covered by permit approved by the Department before acceptance.	(c)(1)
X				Chemical and physical analyses repeated as required.	(c)(1)
X				All waste shipments inspected and sampled.	(c)(2)
X				Waste analysis plan on-site.	(c)(3)
X				24 hr. surveillance at active portion.	(d)(2)(i)
X				Artifical barrier at active portion.	(d)(2)(ii)
X				Proper signs posted and legible at a distance of at least 25 ft.	(d)(3)
X				Inspection schedule on-site.	(e)(2)
X				Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction.	(e)(4)
	X			Immediate remedial action taken where a hazard is imminent or has already occurred.	(e)(4)
X				On the job or classroom personnel training program.	(f)
X				Records retained for each employee at facility of training, job title, and job description.	(f)(6), (7)
X				Ignitable or reactive wastes separated from source of ignition or reaction.	(g)(1)
X				No smoking signs displayed where there are hazards from ignitable or reactive wastes.	(g)(1)
X				Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements.	(g)(2)
X				Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents.	(h)(1)
X				Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	(h)(2)(i)
X				Facility equipped with a device for summoning outside emerency assistance.	(h)(2)(ii)
X				Facility equipped with fire control, spill control, and decontamination equipment.	(h)(2)(iii)
X				Facility equipped with water at adequate volume and pressure to supply fire control equipment.	(h)(2)(iv)
		X		Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.	(h)(3)
X				Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies.	(h)(6)
X				Contingency plan on-site and implemented.	(i)(1)
X				Contingency plan describes action taken by personnel in the event of an emergency.	(i)(3)

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
TSD Facilities – Part B (Continued)

1–No Violation Observed 2–Not Applicable 3–Not Determined 4–Non-Compliance

Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.265
X				Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	(i)(5)
X				Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i)(6)
X				Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item.	(i)(7)
X				Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary.	(i)(8)
X				One employee designated as the primary emergency coordinator either on the premises or on call.	(i)(11)
X				Facility accepting only PA manifests.	(j)
X				Manifest properly completed and routed within time limits (24 hrs.)	(j)(2), (3)
X				Manifest discrepancies resolved or reported within time limits.	(j)(10), (11)
X				Written operating record maintained on the premises.	(k)
X				Written operating record contains description and quantity of wastes and method of treatment, storage or disposal.	(k)(2)(i)
	X			Written operating record contains location and quantity of each hazardous waste.	(k)(2)(ii)
X				Written operating record contains results of waste analyses and treatability tests.	(k)(2)(iii)
X				Written operating record contains reports and details of all incidents.	(k)(2)(iv)
X				Written operating record contains records and results of all inspections.	(k)(2)(v)
X				Written operating record contains required monitoring, testing, and analytical data.	(k)(2)(vi)
X				Written operating record contains closure and post-closure cost estimates	(k)(2)(vii)
X				All records retained on premises and available for inspection.	(l)
X				Quarterly reports submitted to the Department.	(m)
	X			Emissions, discharges, fires, explosions, and groundwater contamination reported as required.	(m)(2)
	X			Groundwater monitoring wells located at approved sites.	(n)(2)
	X			Adequate protection groundwater monitoring wells.	(n)(7)
	X			Groundwater sampling and analysis plan on the premises.	(n)(8)
	X			Groundwater quality assessment and abatement outline on the premises.	(n)(14)
X				Closure plan on the premises and up-to-date.	(o)(2)–(9)
	X			Post-closure plan on the premises and up-to-date.	(o)(10)–(19)
X				Annual closure cost estimate on the premises and up-to-date.	(p)(2)–(4)
	X			Annual post-closure cost estimate on the premises and up-to-date.	(p)(5)–(7)

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
TSD Facilities – Storage (Containers)

1—No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Compliance

Status 1	2	3	4	REQUIREMENT	Chapter Citation 75.265
				Containers managed to prevent leaks and spills.	(q)(1), (4)
				Containers are compatible with waste stored.	(q)(2)
				Containers are closed during storage.	(q)(3)
				Container storage area inspected weekly for leaks, deterioration, etc.	(q)(5)
				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q)(6)
				Satisfactory procedures followed for handling incompatible wastes.	(q)(7), (8)
				Incompatible wastes separated or protected from other materials.	(q)(9)
				Containers accumulation areas have containment system capable of collecting and holding spills, leaks, and precipitation.	(q)(10)
				Containment system has impervious base free of cracks.	(q)(10)(i)
				Efficient drainage provided from base to sump or collection system.	(q)(10)(ii)
				Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater.	(q)(10)(iii)
				Run-on into containment system prevented.	(q)(11)
				Spilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.	(q)(12)
				At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.	(q)(13)
				Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤6 feet high, 8 ft x 8 ft., 5-foot surrounding aisle space).	(q)(14)(i)
				Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria (≤9 feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).	(q)(14)(ii)
				Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.	(q)(14)(ii)
				Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria)≤9 feet high).	(q)(14)(iii)
				Containers labeled to accurately identify hazardous waste contained.	Act 97 Section 403(b)(2)

Drum storage area is not in use.

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
TSD Facilities – Storage (Tanks)

1—No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Compliance

Status 1	2	3	4	REQUIREMENT	Chapter Citation 75.265
X				Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material.	(r)(2)
X				Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r)(3)
	X			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r)(4)
	X			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r)(4)
		X		Continously fed tanks equipped with a means to stop the inflow.	(r)(5)
X				Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r)(6)
X				Monitoring equipment data inspected once each operating day.	(r)(8)(ii)
X				Liquid level of tanks inspected once each operating day.	(r)(8)(iii)
X				Construction materials of tanks inspected weekly.	(r)(8)(iv)
X				Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r)(8)(v)
	X			All hazardous waste removed from tanks and related appurtenances at closure.	(r)(9)
				Placement of ignitable or reactive waste only with the Department's approval.	(r)(10)
	X			Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.	(r)(11)
X				Precautions taken for handling ignitable, reactive or incompatible waste or materials.	(r)(12), (13)
X				Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r)(7)
X				Discharge control equipment inspected once each operating day.	(r)(8)(i)
X				Tanks labeled to accurately identify hazardous waste contained.	Act 97 Section 403(b)(2)

ER-WM-129: Rev. 12/88

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Waste Management

Inspection Report Comments

Date of Inspection 3/26/90 Identification Number PAD980550594

Company/Facility/Site Name Sun Refining and Marketing Co., Inc.

an inspection was conducted on March 26, 1990. There were no violations observed during this inspection. I was not able to observe all the records this day, due to Mr Ware had to catch a flight. So, I returned on April 6, 1990 to finish up looking at records, etc.. There were no violations observed either March 26th, or April 6th.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) _____ Date _____

Inspector (signature) James Davis Date 4/9/90

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

GENERATOR QUARTERLY HAZARDOUS WASTE REPORT

55A

I. Your EPA I.D. No. PA D 0 9 8 0 5 5 7 0 5 9 4

I. TSD Facility's EPA I.D. No. PA D 0 0 0 7 3 8 8 4 9

TSD Facility's Name SAFETY KLEEN CORP

Address 1142 Green Hill Road WEST CHESTER, PA 19380

III. WASTE SHIPPED OFF-SITE

A. US DOT Proper Shipping Name of Waste and State Manifest Document Number (include State Abbreviation)	B. Hazardous Waste Number	C. Weight of Shipment and Unit of Measure (P-pounds, T-ton, K-kilograms, M-metric ton) DO NOT ENTER GALLONS	Put "X" in Box	D. PA. Hazardous Waste Transporter License No.
US DOT Description- WASTE PETROLEUM NAPHTHA COMBUSTIBLE LIQUID UN 1255 (EPA D001) State Manifest Document Number - PAB 536 4085	D 0 0 1	267	K (P) T M	A H 0 1 7 2
US DOT Description- SAME State Manifest Document Number - PAB 533 2353	D 0 0 1	80	K (P) T M	A H 0 1 7 2
US DOT Description- SAME State Manifest Document Number - PAB 536 5706	D 0 0 1	1005	K (P) T M	A H 0 1 7 2
US DOT Description- SAME State Manifest Document Number - PAB 529 4472	D 0 0 1	525	K (P) T M	A H 0 1 7 2
US DOT Description- SAME State Manifest Document Number - PAB 532 7851	D 0 0 1	1165	K (P) T M	A H 0 1 7 2
US DOT Description- SAME State Manifest Document Number - PAB 531 1051	D 0 0 1	160	K (P) T M	A H 0 1 7 2
US DOT Description- SAME State Manifest Document Number - PAB 561 3226	D 0 0 1	782	K (P) T M	A H 0 1 7 2
US DOT Description- SAME State Manifest Document Number - PAB 559 8644	D 0 0 1	985	K (P) T M	A H 0 1 7 2
US DOT Description- WASTE COMPOUND CLEANING LIQUID CORROSIVE MAT'L NA1760 (EPA F002) State Manifest Document Number -	F 0 0 2	45	K (P) T M	A H 0 1 7 2
US DOT Description- State Manifest Document Number -			K P T M	A H

Comments:

985 + 782 = 2.5 Tons

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

GENERATOR QUARTERLY HAZARDOUS WASTE REPORT

55A

I. Your EPA I.D. No. AAD 9 1 8 1 0 1 5 5 7 0 1 5 7 9 1 Y

II. TSD Facility's EPA I.D. No. 0 1 A D 0 1 4 1 5 1 2 1 4 1 3 1 7 1 9 6

TSD Facility's Name ESOT (Fondessy)

Address 826 Otter Creek Road Oregon, Ohio 43616-7571

III. WASTE SHIPPED OFF-SITE

LINE NO.	A. US DOT Proper Shipping Name of Waste and State Manifest Document Number (include State Abbreviation)	B. Hazardous Waste Number	C. Weight of Shipment and Unit of Measure (P-pounds, T-ton, K-kilograms, M-metric ton) DO NOT ENTER GALLONS	Put "X" in Box	D. PA. Hazardous Waste Transporter License No.
	US DOT Description- Hazardous WASTE SOLID, N.O.S NA9189 RQ (API SEPARATOR SLUDGE) State Manifest Document Number - PAB5272621	K051	20.6	K P T M	A H 0 1 9 2
	US DOT Description- State Manifest Document Number -			K P T M	A H
	US DOT Description- State Manifest Document Number -			K P T M	A H
	US DOT Description- State Manifest Document Number -			K P T M	A H
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	US DOT Description- State Manifest Document Number -			K P T M	A H

Comments:

BUREAU OF WASTE MANAGEMENT

GENERATOR QUARTERLY HAZARDOUS WASTE REPORT

55A

Your EPA I.D. No. PAD980550594

TSD Facility's EPA I.D. No. OHD045243706

TSD Facility's Name Fondessy Enterprises, Inc /ACES

Address 876 Otter Creek Road Oregon, Ohio 43616

III. WASTE SHIPPED OFF-SITE

LINE NO.	A. US DOT Proper Shipping Name of Waste and State Manifest Document Number (include State Abbreviation)	B. Hazardous Waste Number	C. Weight of Shipment and Unit of Measure (P-pounds, T-ton, K-kilograms, M-metric ton) DO NOT ENTER GALLONS	Put "X" in Box	D. PA. Hazardous Waste Transporter License No.
1	US DOT Description- Hazardous Waste, Solid, n.o.s, (Heat Exchanger Sludge) NA9189 RQ State Manifest Document Number - PAB4731311	K050	21	K P X M	AH0192
2	US DOT Description- SAME State Manifest Document Number - PAB4731300	K050	20	K P X M	AH0192
3	US DOT Description- State Manifest Document Number -			K P T M	AH
4	US DOT Description- State Manifest Document Number -			K P T M	AH
5	US DOT Description- State Manifest Document Number -			K P T M	AH
6	US DOT Description- State Manifest Document Number -			K P T M	AH
7	US DOT Description- State Manifest Document Number -			K P T M	AH
8	US DOT Description- State Manifest Document Number -			K P T M	AH
9	US DOT Description- State Manifest Document Number -			K P T M	AH
10	US DOT Description- State Manifest Document Number -			K P T M	AH

E. Comments:

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

GENERATOR QUARTERLY HAZARDOUS WASTE REPORT

55A

I Your EPA I.D. No. PAD980550599

II. TSD Facility's EPA I.D. No. TXD008106899

TSD Facility's Name MERICHEM

Address 1914 Haden Road Houston, Texas 77015-6498

III. WASTE SHIPPED OFF—SITE

LINE NO.	A. US DOT Proper Shipping Name of Waste and State Manifest Document Number (include State Abbreviation)	B. Hazardous Waste Number	C. Weight of Shipment and Unit of Measure (P-pounds, T-ton, K-kilograms, M-metric ton) DO NOT ENTER GALLONS	Put "X" in Box	D. PA. Hazardous Waste Transporter License No.
1	US DOT Description- Sodium Hydroxide Solution (Contains Cresylates), NOS, Corrosive, UN 1824, RQ State Manifest Document Number - PAC 1278023	D002	1067	K P (T) M	AH0112
2	DOT Description- State Manifest Document Number -			K P T M	AH
3	US DOT Description- State Manifest Document Number -			K P T M	AH
4	US DOT Description- State Manifest Document Number -			K P T M	AH
5	US DOT Description- State Manifest Document Number -			K P T M	AH
6	DOT Description- State Manifest Document Number -			K P T M	AH
7	US DOT Description- State Manifest Document Number -			K P T M	AH
8	US DOT Description- State Manifest Document Number -			K P T M	AH
9	US DOT Description- State Manifest Document Number -			K P T M	AH
10	US DOT Description- State Manifest Document Number -			K P T M	AH

E. Comments:

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

GENERATOR QUARTERLY HAZARDOUS WASTE REPORT

55A

I. Your EPA I.D. No. PAD980550594

II. TSD Facility's EPA I.D. No. PAD018569592

TSD Facility's Name Waste Conversion Inc

Address 2869 Sandstone Drive Hatfield, Pa 19440

III. WASTE SHIPPED OFF—SITE

LINE NO.	A. US DOT Proper Shipping Name of Waste and State Manifest Document Number (include State Abbreviation)	B. Hazardous Waste Number	C. Weight of Shipment and Unit of Measure (P-pounds, T-ton, K-kilograms, M-metric ton) DO NOT ENTER GALLONS	Put "X" in Box	D. PA. Hazardous Waste Transporter License No.
1	US DOT Description- RQ Waste Sodium Dichromate, OEM-A, NA 1479 State Manifest Document Number - PAC 1001431	D007	1720	K (P) T M	AH 01396
2	DOT Description- State Manifest Document Number -			K P T M	AH
3	US DOT Description- State Manifest Document Number -			K P T M	AH
4	US DOT Description- State Manifest Document Number -			K P T M	AH
5	US DOT Description- State Manifest Document Number -			K P T M	AH
6	DOT Description- State Manifest Document Number -			K P T M	AH
7	US DOT Description- State Manifest Document Number -			K P T M	AH
8	US DOT Description- State Manifest Document Number -			K P T M	AH
9	US DOT Description- State Manifest Document Number -			K P T M	AH
0	US DOT Description- State Manifest Document Number -			K P T M	AH

E. Comments:

Sun Refining and
Marketing Company
P O Box 426
Marcus Hook PA 19061-0426

April 10, 1989

Pennsylvania Department of Environmental Resources
Division of Hazardous Waste Management
P.O. Box 2063
Harrisburg, PA 17120

Dear Sir:

Enclosed is the Pennsylvania Quarterly Hazardous Waste Report for the Sun Refining and Marketing Company's Marcus Hook Refinery. This report is filed pursuant to Sections 75.262 (i) and 75.265 (m) of the Pennsylvania Code and covers the period January 1, 1989 to March 31, 1989.

Sincerely,
SUN REFINING AND MARKETING COMPANY

Richard E. Ware
Environmental Engineering

REW:erh
Enclosure
cc: S. C. Martini
REW-PA10

ER-WM-55: REV:9/87
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT
P.O. Box 2063
Harrisburg, PA 17120

55

QUARTERLY HAZARDOUS WASTE REPORT — GENERAL INFORMATION

I. This report is for the quarter ending (check one):

- ☑ March 31
- ☐ June 30
- ☐ September 30
- ☐ December 31

19 89
Yr.

II. Your EPA I.D. Number | P | A | D | 9 | 8 | 0 | 5 | 5 | 0 | 5 | 9 | 4 |

III. ☐ Check this block, if there is nothing to report this quarter.

IV. Name of Installation Sun Refining and Marketing Company - Marcus Hook Refinery

V. Mailing Address P.O. Box 426 - Marcus Hook, PA 19061

VI. Location Address Delaware Avenue and Green Streets
Marcus Hook, PA 19061

If within PA, Marcus Hook (Name of Municipality) ☐ City ☒ Borough ☐ Township (Check one) Delaware County

VII. Contact Person Stephen C. Martini OK Sch

Phone No. 215 (Area Code) - 447 - 1176

VIII. CERTIFICATION

ertify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

A. Print or Type Name	B. Signature of Authorized Representative	C. Date Signed
Malcolm E. Flint Refinery Manager	Malcolm E. Flint	4/17/89

Sun Refining and Marketing Company
P O Box 426
Marcus Hook PA 19061-0426

January 9, 1990

Pennsylvania Department of Environmental Resources
Division of Hazardous Waste Management
P.O. Box 2063
Harrisburg, PA 17120

Dear Sir:

Enclosed is the Pennsylvania Quarterly Hazardous Waste Report for the Sun Refining and Marketing Company's Marcus Hook Refinery. This report is filed pursuant to Sections 75.262 (i) and 75.265 (m) of the Pennsylvania Code and covers the period ending December, 1989.

Sincerely,
SUN REFINING AND MARKETING COMPANY

Richard E. Ware (SCM)

Richard E. Ware
Environmental Engineering

REW:erg
Enclosure
REW-PA10

bcc: S. C. Martini OK SCM 1/12/90
File: Hazardous Waste Quarterly Reports

ER-WM-55: REV:9/87
Please Type or Print in Ink

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT
P.O. Box 2063
Harrisburg, PA 17120

55

QUARTERLY HAZARDOUS WASTE REPORT – GENERAL INFORMATION

I. This report is for the quarter ending (check one):

- ☐ March 31
- ☐ June 30 — 19 89 Yr.
- ☐ September 30
- ☑ December 31

II. Your EPA I.D. Number | P | A | D | 9 | 8 | 0 | 5 | 5 | 0 | 5 | 9 | 4 |

III. ☐ Check this block, if there is nothing to report this quarter.

IV. Name of Installation: Sun Refining and Marketing Company - Marcus Hook Refinery

Mailing Address: P.O. Box 426
Marcus Hook, PA 19061

VI. Location Address: Delaware Avenue & Green Streets
Marcus Hook, PA 19061

If within PA, Marcus Hook (Name of Municipality) — ☐ City ☒ Borough ☐ Township (Check one) — Delaware County

VII. Contact Person: Richard E. Ware

Phone No. 215 (Area Code) - 447 - 1178

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

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A. Print or Type Name	B. Signature of Authorized Representative	C. Date Signed
John A. Rossi Refinery Manager	John A. Rossi	1/19/90

ER-WM-55A: Rev. 9/87
Please Type or Print in Ink

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

GENERATOR QUARTERLY HAZARDOUS WASTE REPORT

55A

I Your EPA I.D. No. PAD980550594

II. TSD Facility's EPA I.D. No. PADOOO173849

TSD Facility's Name Safety Kleen Corp

Address 1142 Green Hill Road West Chester, Pa 19380

III. WASTE SHIPPED OFF-SITE

LINE NO.	A. US DOT Proper Shipping Name of Waste and State Manifest Document Number (include State Abbreviation)	B. Hazardous Waste Number	C. Weight of Shipment and Unit of Measure (P-pounds, T-ton, K-kilograms, M-metric ton) DO NOT ENTER GALLONS	Put "X" in Box	D. PA. Hazardous Waste Transporter License No.
1	US DOT Description- WASTE PETROLEUM NAPHTHA, COMBUSTIBLE LIQUID, UN 1255 (EPA D001) State Manifest Document Number - PAC 0703264	D001	1810	K (P) T M	AH0172
2	DOT Description- SAME AS 1. State Manifest Document Number - PAC 0785584	D001	258	K (P) T M	AH0172
3	US DOT Description- SAME AS 1. State Manifest Document Number - PAC 0738242	D001	1534	K (P) T M	AH0172
4	S DOT Description- WASTE COMPOUND CLEANING LIQUID, CORROSIVE MATERIAL NA1760 (EPA F002) State Manifest Document Number - PAC 0738242	F002	45	K (P) T M	AH0172
5	US DOT Description- SAME AS 1. State Manifest Document Number - PAC 0795266	D001	344	K (P) T M	AH0172
6	DOT Description- SAME AS 1. State Manifest Document Number - PAC 0676524	D001	1601	K (P) T M	AH0172
7	US DOT Description- SAME AS 1. State Manifest Document Number - PAC 0706064	D001	172	K (P) T M	AH0172
8	US DOT Description- State Manifest Document Number -			K P T M	AH
9	US DOT Description- State Manifest Document Number -			K P T M	AH
10	US DOT Description- State Manifest Document Number -			K P T M	AH

E. Comments:

5721 = 2.9 Tons

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 2063
Harrisburg, PA 17120

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

ER-SWM-51:REV. 10/86 Form Approved. OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. P.A.D.9.8.0.5.5.0.5.9.4 Manifest Document No. 8.8.0.3.1.1 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law but is required by State law.

3. Generator's Name and Mailing Address
Sun Refining and Marketing Company
P.O. Box 426, Marcus Hook, PA 19061

4. Generator's Phone (215) 447-1178

A. State Manifest Document Number PAB 4731311

B. State Gen. ID PAD 980 550 594

5. Transporter 1 Company Name: Snow Environmental Services | 6. US EPA ID Number: P.A.D.0.2.0.0.7.0.3.0.1 | C. State Trans. ID: PA-AH 0.1.9.2

7. Transporter 2 Company Name: N/A | 8. US EPA ID Number: N/A | D. Transporter's Phone (215) 667-4968

E. State Trans. ID: PA-AH

9. Designated Facility Name and Site Address
Environmental Services of Ohio (ESOI)
876 Otter Creek Road
Oregon, Ohio 43616-7571

10. US EPA ID Number: O.H.D.0.4.5.2.4.3.7.0.5

F. Transporter's Phone ( )

G. State Facility's ID: Not Required

H. Facility's Phone (419) 726-1521

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste, Solid, NOS (Heat Exchanger Sludge) NA 9189 RQ	0 0 1	DT	4.3.0.4.0	P	K.0.5.0
b.			3.4.6	P	
c.			21.47	T	
d.					

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code)

	Haz. Code	Physical State		Haz. Code	Physical State
a.	T	S	c.		
b.			d.		

K. Handling Codes for Wastes Listed Above
a. T01 c.
b. d.

15. Special Handling Instructions and Additional Information
Fondessy ID #PCN-0236K

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
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Printed/Typed Name: Richard E. Ware | Signature | Month 0.3 Day 1.6 Year 8.8

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Allen L Detwiler | Signature | Month 0.3 Day 1.6 Year 8.8

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month . Day . Year .

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: JERRY Pekle | Signature | Month 0.3 Day 1.7 Year 8.8

PAB 4731311

EPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete

COPY 3 – TSD FACILITY: MAIL TO GENERATOR

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 8550
Harrisburg, PA 17105-8550

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS AND CHEMOTHERAPEUTIC WASTE.

Form approved.
OMB No. 2050-0039
Expires 9-30-91

2-109-03

ER-WM-51 REV. 11/89

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. PAD 980550594 | Manifest Document No. 83377 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law but is required by State law.

3. Generator's Name and Mailing Address
SUN OIL CO
ZONE 5 SHOP
MARCUS HOOK ( ) BLUE BALL AVE PA 19061

A. State Manifest Document Number PAC 1947691

B. State Gen. ID

4. Generator's Phone 215 447 1969

5. Transporter 1 Company Name: SAFETY-KLEEN CORP. | 6. US EPA ID Number: ILD 051060408 | C. State Trans. ID: PA- A II 0172

7. Transporter 2 Company Name | 8. US EPA ID Number | D. Transporter's Phone 215 436-5848

E. State Trans. ID: PA-

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP. 2-109-03
1142 GREEN HILL ROAD
WESTCHESTER, PA 19380 | 10. US EPA ID Number: PAD 000738484

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone 215 436-5848

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE PETROLEUM NAPHTHA COMBUSTIBLE LIQUID UN1255(D001)(EPC #27)	12	DM	01082	P	D001
b.					
c. NOTICE: IN ACCORDANCE WITH 40 CFR 268.7 THE GENERATOR PROVIDED NOTICE					
d. THAT THE WASTE DESCRIBED AS "WASTE PETROLEUM NAPHTHA" IS A RESTRICTED WASTE. THE WASTE CONTAINS THE FOLLOWING CONSTITUENTS ABOVE TREATMENT STANDARDS ARE NOTED: TOTAL HALOGENATED ORGANIC COMPOUNDS (1000 MG/L).					

J. Additional Descriptions for Materials Listed Above

	Lab Pack	Physical State		Lab Pack	Physical State
a.			c.		
b.			d.		

K. Handling Codes for Wastes Listed Above

a. S02	c.
b.	d.

15. Special Handling Instructions and Additional Information
9020 1955A982 383377 2-109-03-1035 0101
EMERGENCY RESP#1-703-858-4660 FOR RECYCLE
IF UNDELIVERABLE RETURN TO GENERATOR
SHOOT#'s: 501 B:

283376 7734
283402 9070 282095 1884
283375 7733 283073 1684
283374 7731 283072 1683
283373 7730 283099 1804
283372 7729 M3458 806
283371 7728

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Printed/Typed Name	Signature	MONTH	DAY	YEAR
		05	15	11

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	MONTH	DAY	YEAR
		05	15	11

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	MONTH	DAY	YEAR

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	MONTH	DAY	YEAR

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DER (717) 787-4343

Copy 8 - Generator: Retain This Copy

Harrisburg, PA 17105-8550

ER-WM-51 REV. 11/89

Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: PAD 980550594
Manifest Document No.: 63778
2. Page 1 of 1

Information in the shaded areas is not required by Federal law but is required by State law.

A. State Manifest Document Number: PAC 1389411

3. Generator's Name and Mailing Address
SUN OIL CO
XXXXXXXXXXXXX BLUE BALL AVE
MARCUS HOOK PA 19061

B. State Gen. ID

4. Generator's Phone (215) 485-1121

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 051060408
C. State Trans. ID: PA- AH 0172
D. Transporter's Phone (215) 436-5848

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Trans. ID: PA-
F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP. 2-139-03
1142 GREEN HILL ROAD
WESTCHESTER, PA 19380

10. US EPA ID Number: PAD 000738849

G. State Facility's ID
H. Facility's Phone (215) 436-5848

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. ~~WASTE PETROLEUM NAPHTHA~~ COMBUSTIBLE LIQUID UN1255(D001)(ERG #27)	018	DM	01507	P	D001
b. ~~WASTE COMPOUND, CLEANING, LIQUID~~ CORROSIVE MATERIAL NA1760(F002)(ERG#60) Carburetor Cleaner	001	DM	00045	P	F002 F004
c. ~~WASTE PETROLEUM NAPHTHA~~ COMBUSTIBLE LIQUID UN1255(D001)(ERG #27)	001	DF	00027	P	D001
d. NOTICE: IN ACCORDANCE WITH 40 CFR 268.7, THE GENERATOR PROVIDES NOTICE ~~THAT THE WASTE DESCRIBED AS 'WASTE PETROLEUM NAPHTHA'~~ IS A RESTRICTED WASTE. THE WASTE CONTAINS THE FOLLOWING CONSTITUENTS WHOSE TREATMENT STANDARDS ARE NOTED: TOTAL HALOGENATED ORGANIC COMPOUNDS (1000 MG/L).					

J. Additional Descriptions for Materials Listed Above

	Lab Pack	Physical State		Lab Pack	Physical State
a.		L	c.		L
b.		L	d.		

K. Handling Codes for Wastes Listed Above

a.	S02	c.	S02
b.	S01	d.	

15. Special Handling Instructions and Additional Information
5016 14752372 963778 2-139-03-7734 0101
EMERGENCY RESP#1-708-888-4660 FOR RECYCLE
IF UNDELIVERABLE, RETURN TO GENERATOR
SKDOT# A: 501 B: 503 C: 501 D:
886455 8106 963775 7729
963801 9070 963517 1904
963779 7735 963487 1684
963486 16883
~~963778~~ ~~7734~~
963777 7733
963776 7730

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Printed/Typed Name: Donald Bramble | Signature: Donald Bramble | Month Day Year: 04/16/90

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Steve Leach | Signature: Steve Leach | Month Day Year: 04/16/90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: | Signature: | Month Day Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Mary Lu Hughes | Signature: Mary Lu Hughes | Month Day Year: 04/16/90

GENERATOR / TRANSPORTER / FACILITY

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DER (717) 787-4343

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete

Copy 5 - TSD Facility: Mail to Generator

Copy 8 - Generator: Retain This Copy

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO	Designated Facility
	Safety Kleen Corp.
	Address
	1142 Greenhill Rd.
	West Chester, PA 19380

EPA ID No.	Designated Facility
	PAD000738849

Under manifest number PAC 1939411 the generator noted below is shipping to you a waste determined to be restricted under 40 CFR 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste type and the appropriate treatment standards are as follows:

CHECK ALL THAT APPLY:

√	LINE NO.	WASTE NAME	EPA WASTE TYPE	RESTRICTED CONSTITUENTS	TREATMENT STANDARD (mg/l)
		Petroleum naphtha	D001	Halogenated Organic Compounds	1000
				Lead	500
		Petroleum naphtha (sludge)	D001, D006, D008	Halogenated Organic Compounds	1000
				Lead	500
				Cadmium	100
X	1-B	Compound Cleaning Liquid (Immersion Cleaner)	F002, F004	Cresylic Acid 1,2-dichlorobenzene Methylene chloride	0.75 0.125 0.96
		Tetrachlorethylene	F002	Tetrachlorethylene	0.05
		Trichlorotrifluoroethane	F002	Trichlorotrifluoroethane	0.96
		Paint Related Material	F003, F005	Acetone Methyl Ethyl Ketone Methyl Isobutyl Ketone Toluene Xylene	0.59 0.75 0.33 0.33 0.15

The constituent composition is based upon knowledge of the waste.

Generator Name	EPA ID #
[illegible]	PAC 990550594
Generator Representative Signature	
[signature]	
Name & Title of Representative (Print or Type)	
Donald Brandle Machine Shop Foreman	

S-K Sample Number

White Copy - TSD Facility Canary Copy - Generator

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: PAD980550594 — Manifest Document No.: 89005
2. Page 1 of 1

Information in the shaded areas is not required by Federal law but is required by State law.

A. State Manifest Document Number: PAC 1001431

3. Generator's Name and Mailing Address:
Sun Refining and Marketing Co
P O Box 426 Marcus Hook, PA 19061

4. Generator's Phone (215 447 1178

B. Sate Gen. ID: SAME

5. Transporter 1 Company Name: Wasta Conversion Inc
6. US EPA ID Number: PAD085690592

C. State Trans. ID: PA-AH 0139
D. Transporter's Phone (215 822 8996

7. Transporter 2 Company Name:
8. US EPA ID Number:

E. State Trans. ID: PA-AH
F. Transporter's Phone ( )

9. Designated Facility Name and Site Address:
Waste Conversion Inc
2869 Sandstone Drive
Hatfield, PA 19440

10. US EPA ID Number: PAD085690592

G. State Facility's ID:
H. Facility's Phone (215 822 8996

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Wsate Sodium Dichromate ORM-A NA1479 (D007)	001	DT	x 1720	P	D007
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code)

	Lab Pack	Physical State			Lab Pack	Physical State
a.		S	(E) L.C. WC13618	c.		
b.				d.		

K. Handling Codes for Wastes Listed Above

a. S02 c.
b. d.

15. Special Handling Instructions and Additional Information: P O # Cal List #1
Sodium Dichromate 100%

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name	Signature	Month	Day	Year
Richard E. [illegible]	[signature]	12	[illegible]	[illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Ross Peters	[signature]	12	06	89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Miguel A. Perez	[signature]	12	06	89

PAC 1001431

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete

Copy 5 - TSD Facility: Mail to Generator

Copy 8 - Generator: Retain This Copy

Inspector: Andrew Hopton
Address: 992 Old Eagle School Rd.
Suite 919, Wayne PA 19087
Telephone No: 215-293-0450

RCRA LAND DISPOSAL RESTRICTIONS
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

Sun Refining and Marketing Co. PO Box 426
A. Handler Name B. Street (or other identifier)

Marcus Hook PA 19061-0426
C. City D. State E. Zip Code F. County Name

Oil Refinery
G. Nature of Business; Identification of Operations: SIC Code(s)

PAD980550594
H. EPA ID #

Richard E. Ware 215-497-1178
I. Handler Contact (Name and Phone Number)

II. GENERATOR COMPLIANCE — Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) F001, F002, F004, or F005 ✓ Yes ___ No

(ii) F003 ___ Yes ✓ No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?
___ Yes ___ No

b. Source of the above: Form 8700-12 ___; Part A ___; Part B ✓; Biennial/Annual Reports ✓ other (specify) ✓ manifests

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that

Handler Name: Richard Work
ID Number: PAD980550594
Inspector: Andrew Hoplan
Date: 5/23/90

Comments

solvent wastes may be misclassified or misslabeled, turn to ppendix A-1. To assist in identifying potentially sclassified F-solvents, Appendix A-2 presents a list of rresponding P and U wastes. Note concerns below: _____

Dioxin wastes

a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ___Yes ✓No
(ii) F028 ___Yes ✓No

[F-solvent BDAT standards are presented as Appendix B]

3. California List Waste Identification

a. Does the facility handle any of the following wastes?

(i) D002 ✓Yes ___No
(ii) D004 - D011 ✓Yes ___No

b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic compounds (HOCs), metals, or cyanides? ✓Yes ___No

[California List waste standards are presented as Appendix C]

c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California List wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. ___Yes ✓No

d. Has the generator conducted the paint filter liquids test (Method 9095) [§268.32(i)]?
___Yes ✓No*

Handler Name: Richard Ware
ID Number: PAD980550594
Inspector: Andrew Hepler
Date: 5/23/90

Comments

e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California List wastes? ✓ Yes ___ No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?
___ Yes ___ No

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:_____

f. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Report ___; other (specify) ✓. manifests and inspection interview

4. First Third Waste Identification

a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:
K050, K051

b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes: NO

c. Are any of the soft-hammered wastes California List wastes (see Appendix G)? ___ Yes ___ No NA

If yes, the wastes must meet BDAT standards prior to disposal.

d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? NA
___ Yes ___ No*

Handler Name: Richard Wade
ID Number: PAD805505594
Inspector: Andrew Upton
Date: 5/23/90

Comments

e. Source of the above: Form 8700-12 ___; Part A ✓; Part B ✓; Biennial/Annual Report ✓; other (specify) ✓. interview with Fac. Rep

BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ✓Yes ~~✓~~No APH

2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ✓Yes ___No* ~~NA~~ AFH

3. F Solvents

   a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)? ✓Yes ___No*

4. California List Wastes

   a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg §268.32(h)]? ✓Yes ___No*

5. First Third Wastes

   a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% total suspended solids) §268.7(a)]? ✓Yes ___No*

   b. Does the facility handle K061 wastes? ___Yes ✓No

Handler Name: Richard Ware
ID Number: PAD980550594
Inspector: Andrew Hylen
Date: 5/23/90

Comments

If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (>15% Zn) §268.7(a)] §268.41(a)]? ___Yes ___No* NA

c. Does the facility handle K101 or K102 wastes? ___Yes ✓No

If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] §268.41(a)]? ___Yes ___No* NA

d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)? ___Yes ✓No

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes ✓Yes ___No

(i) List wastes for which "applied knowledge" was used: K050, K051, F002, D001 D007, D002, F002/F004

b. TCLP ___Yes ✓No Facility contact stated that Sun will begin testing using TCLP on K050, K051

(i) List wastes for which "TCLP" was used:

(ii) Appendix E lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ✓Yes ___No

If yes, list: K050, K051, using EP-TOX F002/F004

Handler Name: Richard Wire
ID Number: PAD980550594
Inspector: A. Hopton
Date: 3/23/90

Comments

c. Total waste analysis ✓Yes ___No

d. If files were retained, describe content and basis of applied knowledge determination:
provide anal. results for EP Tox ignitability, Total const., reactivity

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: Testing done 1/per year for filter cakes

Note which wastes were subjected to which tests: _____

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]?
✓Yes ___No*

2. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: _____
F002/F004, D001, K050 Note K051 has been delisted by PA and only goes to PA Landfills

List those that did not exceed standards: _____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment §268.3] ___Yes* ✓No

Handler Name: Richard Ware
ID Number: PAD980550594
Inspector: A. Hopton
Date: 5/23/90

Comments

D. Management

1. Onsite management

a. Were restricted wastes managed onsite?
✓ Yes ___ No

If no, go to "2".

b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted? ___ Yes ✓ No

If yes, TSDF checklist must be completed.

2. Offsite Management

a. If restricted wastes exceed treatment standards, did generator provide treatment or storage facility notification with each shipment? [§268.7(a)(1)]:

(i) EPA Hazardous Waste Number? ✓ Yes ___ No*

(ii) Corresponding treatment standard?
✓ Yes ___ No*

(iii) Manifest number? ✓ Yes ___ No*

(iv) Waste analysis, if available?
✓ Yes ___ No

Identify offsite treatment facilities
Waste Conversions, Safety Kleen

b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including [§268.7(a)(2)]:

(i) EPA hazardous waste I.D. number?
___ Yes ___ No* NA

(ii) Corresponding treatment standard?
___ Yes ___ No* NA

Handler Name: Rich. Ware
ID Number: PAD980550594
Inspector: A. Hepton
Date: 5/23/90

Comments

(iii) Certification regarding waste and that it meets treatment standards? ___Yes ___No*

Identify land disposal facilities receiving the BDAT certified wastes _____

_____

NA

c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix H for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

(i) EPA Hazardous Waste Number? ___Yes ___No*

(ii) Corresponding Treatment Standards? ___Yes ___No*

(iii) All applicable prohibitions? ___Yes ___No*

(iv) The manifest number? ___Yes ___No*

(v) The date the wastes are subject to prohibitions? ___Yes ___No*

(vi) Does generator keep records of all notifications/certifications send to offsite facilities? ___Yes ___No*

List all prohibited wastes for which records are not provided per above §268.7(a)(b):

_____

_____

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

_____

_____

Handler Name: Rich Ware
ID Number: PAD980550594
Inspector: A. Hoffman
Date: 5/23/90

Comments

d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number? ___Yes ___No*

Applicable prohibitions? ___Yes ___No*

The manifest number? ___Yes ___No*

Waste analysis data, where available? ___Yes ___No

(i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [§268.33(f)]? ___Yes ___No

If yes, list facility of destination and waste of concern §268.8(a)(2)]

_____

_____

(ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF §268.7(a)(2)]? ___Yes ___No*

(iii) Has the generator retained a copy of the demonstration on site §268.8(a)(3)-(a)(4)]? ___Yes ___No*

(iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF §268.7(a)(6)] ___Yes ___No*

(v) Did the generator submit the demonstration to the receiving facility upon the intial shipment of the waste [§268.8(a)(3)-(a)(4)]? ___Yes ___No*

NA

Handler Name: Rich Ware
ID Number: PAD980550594
Inspector: A. Hopton
Date: 5/23/90

Comments

(vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation[§268.8(b)(3)]?

___Yes ___No*

Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ___Yes ✓No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]?

___Yes ___No*

If yes, TSDF Checklist must be completed.

Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ___Yes ✓No

If yes, list type of treatment unit and processes

_____

_____

_____

If yes, TSDF checklist must be completed.

Handler Name: Richard Ware
ID Number: PAD980550594
Inspector: A. Hopton
Date: 5/23/90

TRANSPORTER CHECKLIST

I. FACILITY IDENTIFICATION

Sun Refining and Marketing Co. PO Box 426
A. Site Name B. Street (or other identifier)

Marcus Hook PA 19061-0426
C. City D. State E. Zip Code F. County Name

Petroleum Refinery
G. Description of Operations

PAD980550594
H. EPA ID #

Richard Ware 215-447-1178
I. Facility Contact (Name and Phone Number)

II. TRANSPORTER REQUIREMENTS

Facility does have RCRA status as a transporter

Comments

A. Does the transporter store restricted wastes for greater than 10 days [§268.50(a)(3)]? ___Yes ___No

Facility has a transporters license but does not use it

1. If yes, does transporter have 264/265 status as storage facility (e.g., has submitted part A?) ___Yes ___No*

B. Describe inventory controls to ensure that restricted wastes are not stored for greater than 10 days.

NA

C. Does the transporter mix restricted wastes prior to transport to a TSDF? ___Yes ___No

1. If yes, list the restricted wastes that have been mixed:

*/ A potential violation is indicated

Handler Name: Richard Ware
ID Number: PAD980550594
Inspector: A. Hopton
Date: 5/23/96

Comments

NA

List instances where soft hammer wastes have been mixed with restricted wastes:_____

Obtain a list of generators for whom restricted wastes have been transported.

Obtain a list of treatment, storage and disposal facilities which frequently receive restricted wastes.

Facility Name: Richard Ware
ID Number: PAD980550594
Inspector: A. Hopton
Date: 5/23/90

RCRA LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

Sun ReFining and Marketing Co. PO Box 426
A. Facility Name B. Street (or other identifier)

Marcus Hook PA 19061-0426
C. City D. State E. Zip Code F. County Name

Petroleum ReFinery
G. Nature of business; identification of industrial and waste management operations; relevant SIC codes

PAD980550594
H. EPA ID #

Richard E. Ware 215-447-1178
I. Facility Contact (Name and Phone Number)

II.A. For onsite facilities, complete the generator checklist — Comments

B. General Facility Standards

1. General

a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?
~~Both~~ cmc Commercial Lab / ~~Age~~ cmc AGES, Norristown, PA.

b. Describe the frequency of sampling conducted by the facility.
Vary. sludge filter cake, 1x/yr
Semi-annual for all wastes (API sludge if taken out of state)

2. Treatment Facilities Facility does dewater sludge which is delisted by state.

a. Has the treatment facility revised its waste analysis plan [§268.7(b)] to meet the requirements of §264.13 or §265.13? ✓ Yes ___ No*

NA

(i) Is the treatment facility conducting TCLP tests for wastes specified in Appendix A (i.e., those prohibited wastes subject to treatment standards expressed as waste extracts) per §286.7(b)(i)? ✓ Yes ___ No*

* A potential violation is indicated

Facility Name: Sun Oil Marcus Hook
ID Number: PAD980550594
Inspector: A. Hoplan
Date: 5/23/90

Comments

NA

(ii) Is the treatment facility using the paint filter liquid test for the California List waste residues [§268.7(b)(ii)]? ___Yes ✓No

(iii) Is the treatment facility testing the pH of California waste residues? ___Yes ___No

(iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations [§268.7(b)(3)]? ___Yes ___No*

(v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [§268.7(b)(1)] ___Yes ___No*

Land Disposal Facilities

a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [§268.7(c)(1)]? ___Yes ___No*

b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [§268.7(c)(2)]? ___Yes ___No*

c. Are they being tested in conformance with the frequency specified in the waste analysis plan [§268.7(c)(3)] ___Yes ___No*

d. Are the appropriate tests (TCLP vs. total waste) being used [§268.7(c)(2)]? ___Yes ___No*

Storage (§268.50)

a. Are restricted wastes exceeding treatment standards stored (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)?
✓Yes ___No

If no, go to "c."

A potential violation is indicated

Facility Name: Sun Oil Marcus Hook
ID Number: PAD990550594
Inspector: A. Hopkins
Date: 5/23/90

Comments

b. Are all containers clearly marked to identify content and date(s) entering storage [§268.50(a)(2)]? ✓Yes ___No*

c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [§264.73 or §265.73]? ✓Yes ___No*

d. Do operating records agree with container labeling? [§268.50(a)(2) or §264.73 or §265.73] ✓Yes ___No*

e. Is waste exceeding treatment standards stored for less than 1 year? ✓Yes ___No

If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ___Yes ✓No

If yes, state how: _____

f. Was/is waste exceeding treatment standards stored for more than one year? ___Yes ✓No

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____

_____

D. Treatment in Surface Impoundments (§268.4)

1. Are prohibited wastes placed in surface impoundments for treatment? ___Yes X No

If no, go to E.

2. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [§268.4(b) and §268.3]? ___Yes* ___No

* A potential violation is indicated

Facility Name: Sun Oil Marcus Hook
ID Number: PAD980550594
Inspector: A. Hopton
Date: 5/23/88

Comments

NA

3. Did the facility submit a certification of compliance with minimum technology and ground water monitoring requirements, and the waste analysis plan to the Agency [§268.4(a)(4)]? ___Yes ___No*

4. Have the minimum technology requirements been met [§268.4(a)(3)]? ___Yes ___No*

   a. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [§268.4(a)(3)(iii)]? ___Yes ___No*

5. Have the Subpart F ground-water monitoring requirements been met [§268.4(a)(3)]? ___Yes ___No*

6. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [§268.4(a)(2)]? ___Yes ___No*

7. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels? ___Yes ___No

8. Provide the frequency of analyses conducted on treatment residues:_____
   _____

   Does the frequency meet the requirements of the waste analysis plan [§264.13 or §265.13]? ___Yes ___No*

9. Does the operating record adequately document the results of waste analyses performed [§264.13 or §265.13]? ___Yes ___No*

10. Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [§268.4(a)(2)(ii)]? ___Yes ___No*

* A potential violation is indicated

Facility Name: Sun Oil Marcus Hook
ID Number: PAD 980550594
Inspector: A. Hopton
Date: 5/23/90

Comments

a. If answer to 6 is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) ___Yes ___No

11. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ___Yes ___No

12. When removed, were residues of restricted wastes managed subsequently in another surface impoundment? ___Yes ___No

a. Were these residues subject to a valid 268.8 certification? ___Yes ___No*

13. When removed, were wastes treated prior to disposal? ___Yes ___No

a. If yes, are waste residues treated on or offsite? ___Onsite ___Offsite

b. Identify management method _____

NA

E. Treatment

1. Does the facility operate treatment units (regulated or exempt) (not including surface impoundments)? ___Yes ✓No

Facility dewaters API sludge which is delisted by State of PA and Filter Cake disposed of as non-listed waste.

If no, go to "F."

2. Describe the treatment processes, including exempt processes.

3. Does the facility treat soft hammered wastes? ___Yes ✓No

* A potential violation is indicated

Facility Name: Sun Oil Marcus Hook
ID Number: PAD980550594
Inspector: A. Hopton
Date: 5/23/90

Comments

a. If yes, is treatment occurring as described in the generator's certification/demonstration [§26S.8(c)(1)]? ___Yes ___No*

b. Did the treatment facility certify he treated the soft hammered waste as per the generator's demonstration and maintain copies of all certifications [§26S.8(c)(1)]? ___Yes ___No*

c. Did the treatment facility send a copy of the generator's demonstration and certification to the receiving treatment, recovery, disposal or storage facility [§268.8(c)(2)]? ___Yes ___No*

4. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the restricted wastes are less than treatment standards or prohibition levels [§268.7(c)(2)]? ___Yes ___No*

5. Describe frequency of testing of treatment residuals.

_____

_____

_____

6. Was dilution used as a substitute for treatment [§268.3]? ___Yes* ___No

7. Are all notifications, certifications, and results of waste analyses kept in the operating record [§264.73(b) or §265.73(b)]? ___Yes ___No*

8. Are notices provided to land disposal facilities complete with Waste Number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [§268.7(b)(4) and (5) and §268.8(c)(1)]? ___Yes ___No*

9. If the waste or treatment residue will be further managed at another storage or treatment facility, has the treatment facility complied with the 268.7(a) notification and certification requirements applicable to generators [§268.7(b)(6)]? ___Yes ___No*

NA

NA

*A potential violation is indicated
**Do not include SIs addressed under Section "D" of this checklist

Facility Name: Sun Oil Marcus Hook
ID Number: PAD980550594
Inspector: A. Hopton
Date: 5/23/90

Comments

F. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units (landfills, surface impoundments** waste piles, wells, land treatment units, salt domes/beds, mines/caves concrete vault or bunker?) ___Yes ___No

2. Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards for generation or treatment [§§268.7(c)(1); 268.7(a),(b)]?
___Yes ___No*

3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [§268.7(c)(2)] ___Yes ___No*

If yes, was the frequency of testing as required by the facility's waste analysis plan [§264.13 or §265.13]?
___Yes ___No*

4. Were prohibited wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units [§268.30] excluding national capacity variances [§268.30(a)]? ___Yes ___No

If yes, did facility have an approved waiver based on no migration petition [§268.6] or approved case-by-case or capacity extension [§268.5] or treatment standard variance [268.44][§268.30(d), §268.31(d), §268.32(g), §268.33(e)]?
___Yes ___No*

5. Were restricted wastes subject to a national capacity variance or case-by-case extension disposed?
___Yes ___No

If yes, have the minimum technology requirements been met for all units receiving such wastes [§268.30(c), §268.31(c), §268.32(d), §268.33(d)]? ___Yes ___No*

6. Were adequate records of disposal maintained [§264.73(b) or §265.73(b)]? ___Yes ___No*

NA

* A potential violation is indicated
**Do not include SIs addressed under Section "D" of this checklist

Facility Name: Sun Oil Marcus Hook
ID Number: PAD980550594
Inspector: A. Hopton
Date: 5/23/90

Comments

If wastes subject to a nationwide variance, case-by-case extensions [§268.5], or no migration petitions [§268.6] were disposed, does facility have generator's notices [§268.7(a)(3)] and records of disposal? [§264.73(b) or §265.73(b)] ___Yes ___No*

If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? ___Yes ___No

If the owner/operator is disposing of a soft-hammer waste, is he maintaining the generators and treaters (if applicable) notices and certifications [§268.8(a)(2)-(a)(4)]? ___Yes ___No* NA

a. Is the facility disposing of any soft hammer wastes that may be classified as California List wastes? ___Yes ___No

b. Did the facility seek to verify whether these wastes may be subject to all restrictions, e.g., California ban? ___Yes ___No

* A potential violation is indicated
**Do not include SIs addressed under Section "D" of this checklist

EXHIBIT IV-1

GENERAL SITE INSPECTION INFORMATION FORM

A. Site Name: Sun Refining and Marketing Co.
B. Street (or other identifier): PO BOX 426
C. City: Marcus Hook
D. State: PA
E. Zip Code: 19061-0426
F. County Name:

G. Site Operator Information

1. Name
2. Telephone Number
3. Street
4. City
5. State
6. Zip Code

H. Site Description

Petroleum Refinery

I. Type of Ownership

__1. Federal __2. State __3. County __4. Municipal ✓5. Private

J.

✓1. Generator ✓2. Transporter __3. Treatment ✓4. Storage __5. Disposal

K. Regulatory Status

✓1. Interim Status ✓3. Part B Permit Application Submitted

__2. Permitted Facility __4. Part B Permit Application in Preparation

L.

1. Principal Inspector Name: Andrew Hopton
2. Title: Environmental Scientist
3. Organization: COM FPC
4. Telephone No. (area code and No.): 215-293-0450

M. Inspection Participants

1. A. Hopton	FPC	6.	
2. Chris Chorniak	FPC	7.	
3. Richard Ware	Sun	8.	
4.		9.	
5.		10.	

EXHIBIT IV-2

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ✓Yes __No

   a. If yes, EPA I.D. No. PAD980550594
   If no, explain. _____

2. Has facility received hazardous waste from a foreign source? __Yes ✓No

   a. If yes, has it filed a notice with the Regional Administrator? __Yes __No

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? ✓Yes __No

   a. If yes, does it include:

      1. Parameters for which each waste will be analyzed? ✓Yes __No
      2. Test methods used to test for these parameters? ✓Yes __No
      3. Sampling method used to obtain sample? ✓Yes __No
      4. Frequency with which the initial analyses will be reviewed or repeated? ✓Yes __No
      5. (For offsite facilities) waste analyses that generators have agreed to supply? __Yes __No
      6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

         a. Procedures to be used to determine the identity of each movement of waste. __Yes __No
         b. Sampling method to be used to obtain representative sample of the waste to be identified. __Yes __No

4. Does the facility provide adequate security through:

   a. 24-hour surveillance system (e.g., television monitoring or guards)? ✓Yes __No

   OR

(continued)

b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? ✓Yes __No

Describe Fence

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? ✓Yes __No

Describe Gates

General Inspection Requirements

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

a. Monitoring equipment? ✓Yes __No
b. Safety and emergency equipment? ✓Yes __No
c. Security devices: ✓Yes __No
d. Operating and structural equipment? ✓Yes __No
e. Types of problems of equipment:

1. Malfunction ✓Yes __No
2. Operator error ✓Yes __No
3. Discharges ✓Yes __No

6. Does the owner/operator maintain an inspection log? ✓Yes __No

a. If yes, does it include:

1. Date and time of inspection? ✓Yes __No
2. Name of inspector? ✓Yes __No
3. Notation of observations? ✓Yes __No
4. Date and nature of repairs or remedial action? ✓Yes __No

b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) __Yes ✓No

Personnel Training

7. Does the owner/operator maintain personnel training records at the facility? ✓Yes __No

(continued)

How long are they kept? Total time of persons employment

a. If yes, do they include:

1. Job title and written job description of each position? ✓Yes __No
2. Description of type and amount of training? ✓Yes __No
3. Records of training given to facility personnel? ✓Yes __No

Requirements for Ignitable, Reactive, or Incompatible Waste

8. Does facility handle ignitable or reactive wastes? ✓Yes __No

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flame confined to specifically designated locations? ✓Yes __No

c. Are "No Smoking" signs posted in hazardous areas? ✓Yes __No

d. Are precautions documented (Part 264 only)? ✓Yes __No

9. Check containers

a. Are containers leaking or corroding? __Yes ✓No

b. Is there evidence of heat generation from incompatible wastes? __Yes ✓No

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? __Yes ✓No

If yes, use narrative explanation sheet to explain.

(continued)

Barnett

8.A.1.

D001 wastes are contained in sealed thirty gallon containers which are provided by Safety Kleen.

All other ignitable wastes are confined to the API/sewer system which is located below ground, actual separators are covered. All areas of refinery have no - smoking, and no open flame policies.

EXHIBIT IV-2 (continued)

2. Is the facility equipped with:

   a. Internal communication or alarm system? ✓Yes __No

      1. Is it easily accessible in case of emergency? ✓Yes __No

   b. Telephone or two-way radio to call emergency response personnel? ✓Yes __No

   c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? ✓Yes __No

   d. Water of adequate volume for hoses, sprinklers, or water spray system? ✓Yes __No

      1. Describe source of water Delaware River & Stormwater Reservoir as backup

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? ✓Yes __No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) ✓Yes __No

5. In the case that more than one police or fire department might respond, is there a designated primary authority? ✓Yes __No

   a. If yes, name primary authority Sun Oil Fire Department

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? ✓Yes __No

   a. Are they readily available to all personnel? ✓Yes __No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? ✓Yes __No

8. If State or local authorities decline to enter, is this entered in the operating record? ✓Yes __No

(continued)

EXHIBIT IV-2 (continued)

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? ✓Yes __No

   a. If yes, is it a revised SPCC Plan? ✓Yes __No

   b. Does contingency plan include:

      1. Arrangements with local emergency response organizations? ✓Yes __No
      2. Emergency coordinators' names, phone numbers, and addresses? ✓Yes __No
      3. List of all emergency equipment at facility and descriptions of equipment? ✓Yes __No
      4. Evacuation plan for facility personnel? ✓Yes __No

2. Is there an emergency coordinator on site or on call at all times? ✓Yes __No

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? __Yes ✓No

   a. If yes, does the owner/operator retain copies of all manifests? ~~__Yes __No~~

      1. Are the manifests signed and dated and returned to the generator? ~~__Yes __No~~
      2. Is a signed copy given to the transporter? ~~__Yes __No~~

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? __Yes ✓No

   a. If yes, is it accompanied by a shipping paper? ~~__Yes __No~~

      1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ~~__Yes __No~~
      2. Is a signed copy given to the transporter? ~~__Yes __No~~

3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? ~~__Yes __No~~ NA

   a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? __Yes __No

      1. If no, has Regional Administrator been notified? __Yes __No

(continued)

EXHIBIT IV-2 (continued)

4. Does the owner/operator keep a written operating record at the facility? ✓Yes __No

   a. If yes, does it include:

      1. Description and quantity of each hazardous waste received? __Yes __No NA
      2. Methods and dates of treatment, storage, and disposal? __Yes __No NA
      3. Location and quantity of each hazardous waste at each location? __Yes ✓No
      4. Cross-references to manifests/shipping papers? __Yes ✓No
      5. Records and results of waste analyses? ✓Yes __No
      6. Report of incidents involving implementation of the contingency plan? ✓Yes __No
      7. Records and results of required inspections? ✓Yes __No
      8. Monitoring or testing analytical data (Part 264)? ✓Yes __No
      9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? ✓Yes __No ~~NA~~ APH
      10. Notices of generators as specified in §264.12(b) (Part 264)? __Yes __No NA

5. Does the facility submit a biennial report by March 1 every even-numbered year? ✓Yes __No

   a. If yes, do reports contain the following information:

      1. EPA I.D. number? ✓Yes __No
      2. Date and year covered by report? ✓Yes __No
      3. Description/quantity of hazardous waste? ✓Yes __No
      4. Treatment, storage, and disposal methods? ✓Yes __No
      5. Monitoring data under §265.94(a)(2) and (b)(2) (Part 265)? __Yes __No
      6. Most recent closure and post-closure cost estimates? __Yes __No ~~NA~~ APH NOT REVIEW
      7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? ✓Yes __No
      8. Certification signed by owner/operator? ✓Yes __No

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? __Yes __No NA

   a. If yes, has he submitted an unmanifested waste report to the Regional Administrator? __Yes __No NA

7. Does the facility submit to the Regional Administrator reports on releases, fires, and explosions; contamination and monitoring data; and facility closure? ✓Yes __No

EXHIBIT IV-3

LAND DISPOSAL RESTRICTIONS CHECKLIST

1. Are hazardous wastes land-disposed on site? ("Land disposal" includes placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, concrete vault, or bunker intended for disposal purposes; and placement in or on the land by means of open detonation and open burning where residues continue to exhibit hazardous characteristics). __Yes ✓No

   a. If yes, are one or more of the following circumstances true:

      1. Granted extension from effective date pursuant to §268.5? __Yes __No
      2. Granted exemption from a prohibition pursuant to a petition under §268.6? __Yes __No
      3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1988? __Yes __No
      4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? __Yes __No

2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? __Yes ✓No

3. Are there active surface impoundments used for treatment of hazardous wastes? __Yes ✓No

   a. If yes, does the unit's design and operation meet the requirements set forth in §268.4? __Yes __No

4. Has the facility sought exemption from any prohibition under Subpart C of §268 for the disposal of a restricted hazardous waste? __Yes ✓No

   a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? __Yes __No

5. Has the facility determined whether it generates a restricted waste through waste analysis? ✓Yes __No

   a. If yes, is the facility, in fact, handling a restricted waste(s)? ✓Yes __No

(continued)

b. If yes, does the restricted waste require treatment? ✓Yes __No ~~N/A~~ API

c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components (EPA hazardous waste number, corresponding treatment standard, manifest number of shipment)? ✓Yes __No ~~N/A~~ API (K051 waste has been delisted by State of PA)

6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? ✓Yes __No

a. If yes, do any of the following conditions apply:

1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? __Yes ✓No
2. The solvent waste is generated from a CERCLA response corrective action? __Yes ✓No
3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. __Yes ✓No

b. If no, have any of these restricted wastes been land-disposed (except in an injection well) since November 8, 1986? __Yes ✓No

7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? __Yes ✓No

a. If yes, do any of the following conditions apply:

1. Wastes are treated to meet standards of Subpart D of §268? __Yes __No
2. Wastes are disposed of at a facility that has been granted a petition? __Yes __No
3. An extension has been granted? __Yes __No

NA

b. If no, will these restricted wastes be land disposed after November 8, 1988? __Yes __No

8. Are restricted wastes being treated? __Yes ✓No

a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? __Yes __No

EXHIBIT IV-4

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No? ✓Yes __No

   a. If yes, EPA I.D. No. PAD980550594

Section B - Manifest

1. Does generator ship waste offsite? ✓Yes __No

   a. If no, do not fill out Sections B and D.

   b. If yes, identify primary offsite facility(s). Use narrative explanation sheet. APH ESOI ~~Hob~~ Oregon Ohio Safety Kleen Westchester PA Merichem Houston TX Delaware County Landfill Waste Conversion Hatfield PA

2. Does generator use manifest? ✓Yes __No

   a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? __Yes __No

      1. If yes, does generator indicate this when sending waste to a TSD facility? ✓Yes __No

   b. If yes, does manifest include the following information?

      1. Manifest document No. ✓Yes __No

      2. Generator's name, mailing address, telephone No. ✓Yes __No

      3. Generator EPA I.D. No. ✓Yes __No

      4. Transporter Name(s) and EPA I.D. No.(s) ✓Yes __No

      5. a. Facility name, address, and EPA I.D. No. ✓Yes __No
         b. Alternate facility name, address, and EPA I.D. No. ✓Yes __No
         c. Instructions to return to generator if undeliverable ✓Yes __No

      6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) ✓Yes __No

(continued)

EXHIBIT IV-4 (continued)

7. Emergency information (optional) (special handling instructions, telephone No.) — ✓Yes __No

8. Is the following certification on each manifest form? — ✓Yes __No

   This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? — ✓Yes __No

If yes, complete a through e.

a. 1. Did generator sign and date all manifests? — ✓Yes __No
   2. Who signed for generator?

   Name Richard E. Ware Title Sr. Env. Consultant

b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? — ✓Yes __No
   2. Who signed and dated for transporter?

   Name Steve Leach Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? — ✓Yes __No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? — ✓Yes __No

e. Does generator retain copies for 3 years? — ✓Yes __No

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? — ✓Yes __No

   a. If yes, list waste and quantities (include EPA Hazardous Waste No.) K050, K051, F002/F004

K051 has been delisted by State of PA
K050 has not been generated recently, not within past ~~year~~ APH 4/3040 pounds in 1988

F002/F004 = 180 pounds/year
IF sent out of State is listed APH

(continued)

EXHIBIT IV-4 (continued)

2. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) ✓Yes __No

   a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) D001, D002, D007, D001 6000 pounds quarterly, D007 1720 pds annual D002 1000 pounds "

   b. Does generator determine characteristics by testing or by applying knowledge of processes? Knowledge

      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? __Yes ✓No

         a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators? __Yes ✓No

   a. If yes, did generator test all wastes to determine nonhazardous characteristics? __Yes __No

      1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

_____

_____

_____

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? ✓Yes __No

2. a. Are containers to be shipped leaking or corroding? __Yes ✓No

   b. Use sheet to describe containers and condition.

   c. Is there evidence of heat generation from incompatible wastes in the containers? __Yes ✓No

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? ✓Yes __No

4. Does generator mark each package in accordance with 49 CFR 172? ✓Yes __No

(continued)

Barnett

Section D

2b. All fifty gallon drums were in good condition; no rusting, or leaking drums were noted

EXHIBIT IV-4 (continued)

5. Is each container of 110 gallons or less marked with the following label? ✓Yes __No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

_____

Manifest document No. _____ _____

6. Does generator have placards to offer to transporters? ✓Yes __No

7. Accumulation time

a. Are containers used to temporarily store waste before transport? ✓Yes __No

1. If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time) ✓Yes __No

b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ✓Yes __No

2. If yes, with what frequency? weekly

c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) ✓Yes __No

NOTE: If tanks are used, fill out checklist for tanks.

d. Are the containers labeled and marked in accordance with Section D-3, -4, and -5 of this form? ✓Yes __No

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ✓Yes __No

8. Describe storage area. Use photos and narrative explanation sheet.

Storage area is not in use

(continued)

Storage area is a 16,500 sq. Ft concrete pad, with a 6" high berm, a chain link fence on all sides (6' high) fitted with runoff and spill collection system

EXHIBIT IV-4 (continued)

Section E - Recordkeeping and Records

1. Does generator keep the following reports for 3 years?

a.	Manifests and signed copies from designated facilities	✓Yes __No
b.	Annual reports	✓Yes __No
c.	Exception reports	✓Yes __No
d.	Test results	✓Yes __No

2. Where are the records kept (at facility or elsewhere)? Facility

3. Who is in charge of keeping the records?

Name _____ Title _____

Section F - Special Conditions

1.	Has generator received from or transported to a foreign source any hazardous waste?	__Yes ✓No
a.	If yes, has he filed a notice with the Regional Administrator?	__Yes __No
b.	Is this waste manifested and signed by a foreign cosignee?	__Yes __No
c.	If generator transported wastes out of the country, has he received confirmation of delivered shipment?	__Yes __No

EXHIBIT IV-5

TRANSPORTERS CHECKLIST

Section A - EPA I.D. No.

1. Does transporter have an EPA I.D. No.? ___Yes ✓No

   a. If yes, what is EPA I.D.? PAD986550594

Facility has transporter license but does not use it

Section B - Transfer Facility Requirements

NA

1. Does transporter store wastes on site? ___Yes ___No

   a. If yes, does transporter store wastes longer than 10 days? ___Yes ___No

Section C - Manifests

1. Does transporter use manifests? ___Yes ___No

   a. If yes, are manifests signed and dated? ___Yes ___No
   b. Does transporter return signed copies of manifests to generators? ___Yes ___No
   c. Does transporter carry manifests with waste shipments? ___Yes ___No
   d. Does transporter obtain delivery date and signature of owner/operator at delivery? ___Yes ___No
   e. Does transporter retain copies? ___Yes ___No
   f. Does transporter give remaining copies to accepting transporter or facility? ___Yes ___No
   g. Is transporter a water (bulk shipment) transporter? ___Yes ___No

      1. If yes, is waste delivered to receiving facility by water? ___Yes ___No
      2. Does transporter carry a shipping paper with the waste containing all information required on the manifest (excluding EPA I.D. numbers, generator certification, and signatures)? ___Yes ___No
      3. Does transporter obtain delivery date and hand-written signature of owner/operator of designated facility on manifest or shipping paper? ___Yes ___No
      4. Does transporter retain copies of shipping papers or manifests, in accordance with §263.22? ___Yes ___No

(continued)

EXHIBIT IV-5 (continued)

NA

h. Is transporter a rail transporter? __Yes __No

1. If yes, when accepting waste from a nonrail transporter, does rail transporter sign and date manifest acknowledging acceptance of waste? __Yes __No
2. Does rail transporter return a signed copy of manifest to nonrail transporter? __Yes __No
3. Does rail transporter forward manifest copies to:
   a. The next nonrail transporter? __Yes __No
   b. Designated receiving facility (if reached by rail)? __Yes __No
   c. The last rail transporter designated to handle the waste in the U.S.? __Yes __No
4. Does rail transporter retain a copy of manifest? __Yes __No
5. Does rail transporter ensure that a shipping paper accompanies the hazardous waste and contains all information required on manifest (excluding EPA I.D., generator certification, and signatures)? __Yes __No
6. Does rail transporter obtain delivery date and handwritten signature of owner/operator of designated facility or the next nonrail transporter on manifest? __Yes __No
7. Does rail transporter retain a copy of the manifest or signed shipping paper? __Yes __No

i. Does transporter transport waste outside of the U.S.? __Yes __No

1. If yes, does the transporter:
   a. Indicate on manifests the date that shipment left the U.S.? __Yes __No
   b. Sign manifest and retain one copy? __Yes __No
   c. Return a signed copy of manifest to generator? __Yes __No

Section D - Compliance With the Manifest

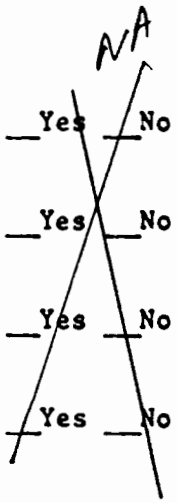
NA

1. Does transporter deliver entire shipment of hazardous waste to:
   a. Designated facility listed on manifest? __Yes __No
   b. Alternate designated facility, if emergency prevents delivery to designated facility? __Yes __No
   c. Next designated transporter? __Yes __No
   d. Place outside U.S. designated by generator? __Yes __No
   e. If no, does transporter contact generator for further directions, and then revise manifest accordingly? __Yes __No

(continued)

EXHIBIT IV-5 (continued)

Section E - Recordkeeping



1. Does transporter keep a copy of manifest signed by generator, himself, and next designated transporter for 3 years? __Yes __No

2. Does water (bulk shipment) transporter retain copy of shipping paper for each shipment delivered by water? __Yes __No

3. Does initial rail transporter keep a copy of manifest and/or shipping paper? __Yes __No

4. Does transporter shipping waste outside of the U.S. keep for 3 years copy indicating that waste was shipped? __Yes __No

EXHIBIT IV-6

CONTAINERS CHECKLIST

Section A - Use and Management

1. Are containers in good condition? ✓Yes __No

Section B - Compatibility of Waste With Container

1. Is container made of a material that will not react with the waste which it stores? ✓Yes __No

Section C - Management of Containers

1. Is container always closed while holding hazardous waste? ✓Yes __No

2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak? ✓Yes __No

Section D - Inspections

1. Does owner/operator inspect containers at least weekly for leaks and deterioration? ✓Yes __No

Section E - Containment (Part 264)

1. Do container storage areas have a containment system? ✓Yes __No

Section F - Ignitable and Reactive Waste

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? ✓Yes __No

Section G - Incompatible Waste

1. Are incompatible wastes or materials placed in the same containers? __Yes ✓No

2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? ~~__Yes__~~ ~~No~~

(continued)

EXHIBIT IV-6 (continued)

3. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device? __Yes __No

Section H - Closure (Part 264)

1. At closure, were all hazardous wastes and associated residues removed from the containment system? __Yes __No

A160

(314)

U. S. Environmental Protection Agency
Environmental Services Division
EPA, Region III

AIR COMPLIANCE INSPECTION REPORT
OIL REFINERY

1. GENERAL INFORMATION

Company Name: Sun Refining and Marketing
Address: Market Street , Marcus Hook, PA

CDS# 39-1660-00035
Form of Ownership: Corporate
Company Phone Number (215) 447-1198
Company Personnel/Title Art Meritt
State Personnel/Title Neil O'Connor, PA DER
EPA Personnel/Title Mike Giuranna, Jim Gouvas, ESD Jeannine Kubli, AMD
Date of Inspection 3/14,15/90 Arrival 9:30AM Depart 4:45PM

2. SPECIFIC INFORMATION
Type of Facility Receive Crude Oil from Tankers and process it into gasoline, various oils, and light gases. This processing is done distillation and catalytic cracking.
Daily Production: Days/Week 7 Hours/Day 24 Shifts/Day 3
Rated Production Rate/Day 190,000 barrels/day
Actual Production Rate/Day 190,000 barrels/day
Number of Employees

3. SOURCES INSPECTED

For this inspection we targetted 5 processes to inspect. They were:

1. Benzene Storage tanks and refinery components in benzene service under 40 CFR Part 61 Subparts V and J.

2. All storage tanks greater than 40,000 gallons capacity containg VOC's(PA reg. 129.56).

3. Possible sources of particulate emissions including the fluid catalytic cracking unit and the process boilers.

4. All fugitive VOC sources, specifically components in VOC service for which Sun is required to conduct quarterly leak checks.

5. Any sulfur recovery or sulfur handling processes which could result in sulfur releases to the atmosphere.

4. PROCESS INSPECTIONS

4.1. BENZENE TANKS AND COMPONENTS IN BENZENE SERVICE

Sun's petrochemical unit contains a 17-2 Udex unit, which sends purified and recycled toluene to the 15-5 Toluene Disproportionation Unit(TDP). In the TDP toluene reacts in the prescence of a catalyst to form benzene and xylene.

There are 7 benzene storage tanks and approximately 2,000 components(valves, compressors, etc.) in benzene service. We inspected the roof seals on all 7 tanks and the results of our inspections were:

TANK #	SEAL CONDITION
619	Good
620	Saw approximately 2 foot area of bad seal, also saw product.
621	Saw approximately 2 foot area of bad seal, also saw product.
622	Saw product around ladder area.
623	Good
624	Good
625	Good

Sun has a contractor who does all leak checks, including leak checks of components in benzene service. According to their records less than 2% of the benzene components leak, and all leaks are fixed within 15 calendar days as required by 40 CFR Part 61.242-7(d). We did a random survey of components in benzene service while we were there, using a GSA LEL detector. We checked 50 random components and found no leaks. So it appears that Sun is doing a good job with their benzene leak detection program. We also saw several tags indicating reairs had been made to benzene components which had been found leaking.

4.2 GASOLINE STORAGE TANKS

In accordance with PA DER regulation 129.56, we inspected the internal floating roof seals on 8 gasoline storage tanks at Suns #2 Tank Farm. Our findings are summarized below:

TANK#	SEAL CONDITION
316	Bad seal around ladder; rim seal is deteriorating.
317	Product level was too low to allow inspection.
320	Seal in good condition.
324	Seal in good condition.
325	Product was visible around ladder.
327(external floating roof)	Seal in good condition.
328	Product level too low couldn't inspect.
331	Product was visible around ladder.
333	Could only see one-third of seal; the part I saw was in good condition.

Sun has no program to inspect the internal floating roofs of these tanks, as required by PA regulation 129.56(f), because of their employee safety policy. Tanks are only inspected when they are cleaned or refurbished. Internal seals are difficult to thoroughly inspect due to the lack of roof vents to let in sunlight. However, if the roof is inspected on a sunny day with a small hand held mirror, to provide the necessary light, the entire internal roof should be visible.

4.3 PATICULATE EMISSION SOURCES

We inspected the Fluid Catalytic Cracking Unit(FCCU) which is the major source of particulate emissions in the plant. Details of this process can be found in my inspection report of January 16, 1990. We observed no visible emissions coming off either the main or bypass stacks while we were there. Sun recently had a stack test to determine whether they meet DER's grain loading standard with the lower half of their electrostatic turned off. The report is expected soon but Sun officials told me that the planned to fix the ESP unit regardless of what the report showed.

We also inspected the 15-1 boiler house where all the steam is made for the plant. On Thursday morning we observed an opacity of 20-25% coming out of the process stack for these boilers.

4.3 PARTICULATE EMISSION SOURCES(cont.)

Mr Meritt explained that this was a rare occurence which sometimes happened when the plant had to generate large amounts of steam. The opacity from this stack soon went to 0%. There 6 boilers which burn natural gas, refinery fuel gas(high viscosity oil), and number 6 fuel oil. There smoke indicators and combustibles indicators on each boiler. If the smoke goes above a certain opacity an alarm goes off in the control house and the air intake is adjusted to reduce the opacity. Sulfur Dioxide(SO2) samples are taken every morning. The sulfur content of the combustibles is limited to 0.6 lb per million BTU, but the sulfur content is usually around 0.3 lb/MMBTU.

4.4 VOC LEAK CHECK AND NSPS INSPECTION

We inspected Plant 12 which contains a crude oil distillation unit which is subject to NSPS requirements (Subpart J). In this area The crude oil is heated to boiling and the long chain hydrocarbons go out the bottom and the lighter fractions come off the top. There is a desulfurizer on this unit which removes the sulfur from the crude and converts it to H2S and sends it to the gas plant. Sun has two Combustion Engineering hydrogen sulfide(H2S) analyzers which have not yet been certified. These two analyzers have met the low range calibration but have not yet met the mid to high range calibration standard.

We next performed a VOC leak check survey using the GSA LEL meter. We did a random check of 40 components in VOC service and did not find a leak. Nine of the components we checked had tags on them which indicated that they had been leaking and were repaired.

We also did a leak check at the Ethylene plant which has the largest number of components in VOC service of any part of the refinery. Environmental Control Services is the contractor employed by Sun to handle their leak detection and repair program. We reviewed their 1989 report and found that less than 2% of the components in VOC service leaked during 1989. We did a random leak survey of 103 components and found 8 which were leaking(7.77%). This is much higher than ECS's 1989 report indicated. We informed Sun of our finding and they said the would have the entire area checked. there approximately 1,700 components in VOC service in the Ethylene plant.

4.5 SULFUR EMISSION SOURCES

There are five areas which have possible sulfur emissions. Four of thes areas handle the crude oil which normally contains around 0.2% sulfur. These areas are the FCCU and the 3 crude units. The FCCU unit has an SO2 meter which takes readings every 10 minutes. The SO2 conntent out the FCCU stack is limited to 450 Parts per Million(PPM) by DER. The sulfur form the crude units is removed by a desulfurizer and sent to the Ethlylene complex. At the Ethlyene complex the incoming gases are compressed to 400 psi and sent to the MEA absorber to absorb SO2. The SO2 comes off of the bottom of the distillation column and is heated in a heat exchanger. The pressure of the gas stream is reduced to 15 psi in a Stripping column and a 50-50 stream of MEA and H2S comes off the top. The MEA drops out into a knockout drum and the H2S is sent to nearby General Chemical by pipeline. General Chemical uses this H2S to make Sulfuric Acid.

This area was in good condition and we saw no leaking pipes nor did we detect any sulfur odors in the area. There are no point in this complex where sulfur could be emitted. The only SO2 emission point in the plant is at the FCCU unit where it is continuously monitored.

5. MISCELLANEOUS

Sun has been experiencing problems with the Marcus Hook community and the nearby Marcus Hook Elementary School in particular. Several incidents of foul odors in the school and community have been blamed on Sun. Sun officials have not been able to find any reason for these odors and are considering bringing in a third party to investigate. We didnot notice any foul odors during our inspection. The Marcus Hook Elementary School has had their ventilation system examined and cleaned but the incidents have not stopped. PA DER has an inspector driving around the refinery/school area several times a day but the source of these odors has not been found. Also more details on plant operations can be found in NEIC's 1988 inspection report on this facility.

6. CONCLUSIONS

With the possible exception of the Benzene and Gasoline storage tank roof seals and the FCCU ESP unit, Sun is in compliance with all applicable Federal and State regulations.

See

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Submittal of Inspection Reports **DATE:** March 28, 1900

FROM: Charles Kanetsky, Acting Chief
Philadelphia Operations Section(3ES11)

TO: Bernard Turlinski, Chief
Air Enforcement Branch(3AM20)

Attached is an Inspection Report from the following facility:

Facility	CDS number	AE Contact
Sun Oil Refining & Marketing	39-2360-00026	Jeanine Kubli

If you have any questions please call me.

Attachments

A-156

(310)

U. S. Environmental Protection Agency
Environmental Services Division
EPA, Region III

COMPLIANCE INSPECTION REPORT

1. GENERAL INFORMATION

Company Name: Sun Refining and Marketing
Address: Lower Chichester/ Marcus Hook , PA

CDS# 39-2360-00026
Form of Ownership: Corporate
Company Phone Number 215-447-1198
Company Personnel/Title Steve Martini, Risk Manager
Laura Grossi-Tyson, Legal Michael Hennigan, Sun Operations
Jeff Peters, Public Relations Barry Morlock, Maintenance
Art Meritt, Environmental Consultant
State Personnel/Title Neil O'Connor, Pa DER
EPA Personnel/Title Mike Giuranna & Jim Gouvas ESD, POS
Jeannine Kubli, AMD, AEB

Date of Inspection 1/16/90 Arrival 10;00AM Depart 1:00 PM
2. SPECIFIC INFORMATION
Type of Facility Oil Refinery

Daily Production: Days/Week 7 Hours/Day 24 Shifts/Day 3
Rated Production Rate/Day
Actual Production Rate/Day
Number of Employees
3. REASON FOR INSPECTION

On August 20, 1989 at approximately 1:30pm Sun had to switch from venting out their concrete stack, which has an electrostatic precipitator, to a metal bypass stack, with no control equipment for 10 days. During this period the exhaust from this uncontrolled stack caused damage to cars parked in the vicinity. The damage came from catalyst(aluminum silicate) which had built up in the stack and from refractory material which had been blown out from the deterioration of the inner shell of the stack. Mr. Peters informed us that Sun had paid out 1 million dollars in about 550 claims, all for paint damage to cars. The money was used for anything from washing the car to a complete paint job which often required the car to be stripped down to the bare metal before painting.

4. DESCRIPTION OF PROCESS

Crude Oil is sent into the Fluid Catalytic Cracking Unit(FCCU) where it reacts with the aluminum silicate catalyst and then sent to the fractionating tower to be separated into short and long chain hydrocarbons. The catalyst used in the reaction is sent to the regenerator where it reacts with air to clean the carbon off the particles and then sent back to be used in the FCCU. Once the catlyst is spent and cannot be regenerated it is sent through the Expander then sent with the other flue gases through the Carbon Monoxide Boiler and then through an Electrostatic Precipitator, to remove particulate and then vented through an approximately 200 feet high stack. This stack is equipped with a Dynatron Continuous Emissions Monitor(CEM).

If there are any problems with the CO Boiler a valve can be opened which will sent the flue gas and spent catalyst out a bypass stack. However, this stack does not contain any pollution control equipment. The CO Boiler and the expander are used to recover energy to use in other parts of the plant. A crude drawing of the process is pictured on the following page.

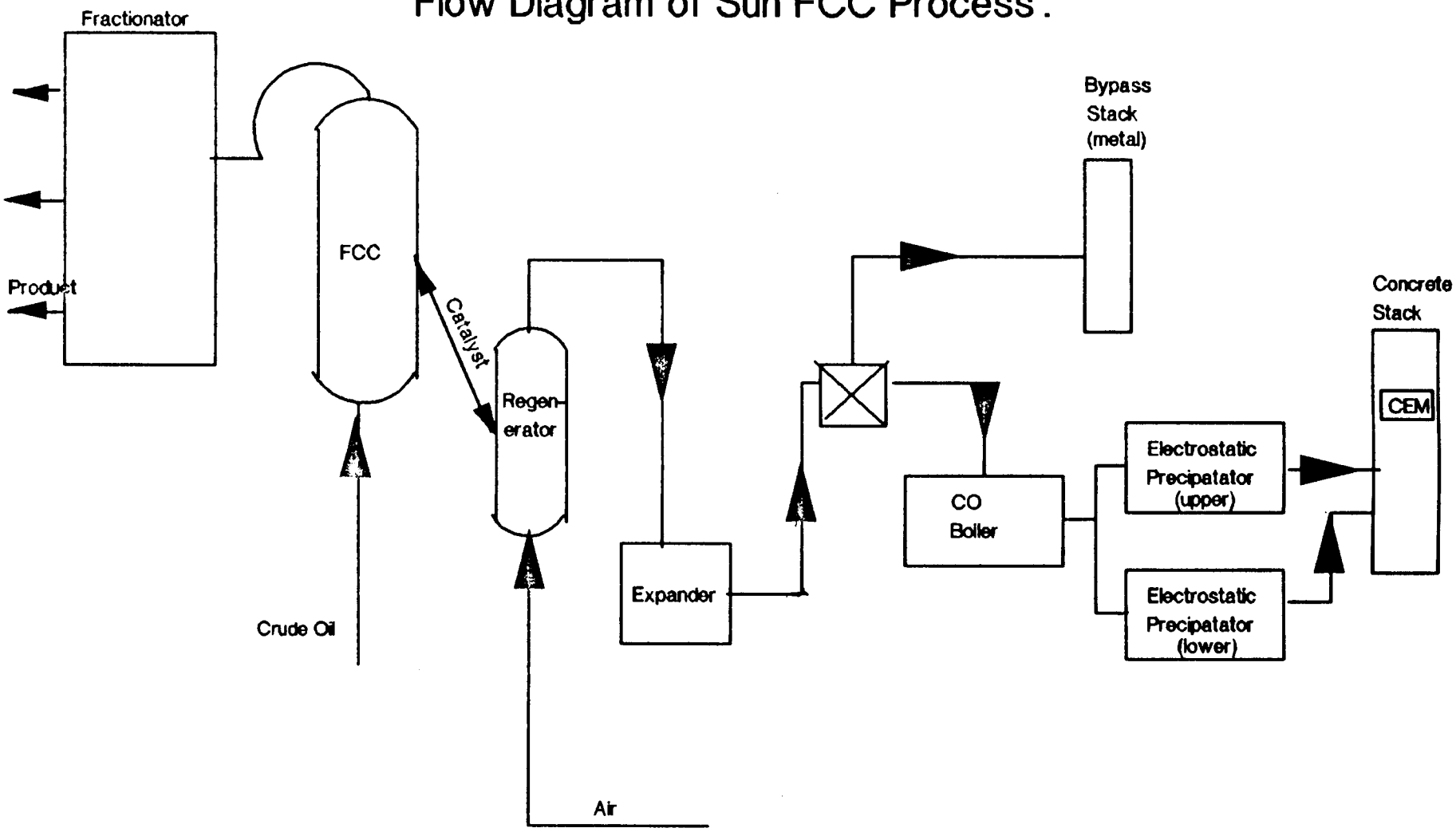
5. MEETING WITH SUN OFFICIALS

Sun was forced to vent the gas from the process to the bypass stack as a result of discovering several tube leaks in the CO Boiler which forced them to shut down the boiler for repairs. This has been done before and there have been minor incidents resulting from buildup of catalyst in the line leading to the bypass stack. However this time Sun believes that the deterioration of the inside of the bypass stack caused a great deal of refractory material to be emitted along with the regular flue gas and this resulted in the damage to the cars in the vicinity of the plant. As a result of this incident Sun has completly rebuilt the inside of this stack, something which has not been done since the stack was built in the 1960's. Also to minimize damage to the inside of this stack from thermal shock(a large, sudden rise in temperature), Sun has instructed its operators to open the valve to the bypass stack as slowly as possible to insure a slower rise in temperature. Also Sun has inserted a blank in the ductwork leading to the bypass stack and is now able to inspect the inside of the stack so it will now be aware of the condition of the stack and what type of material is in it before they would use it.

Sun plans to shut down the entire FCC unit in the fall for a full inspection of the process. Also they have a consultant come in once a year to check out the ESP, and the CEM is calibrated regularly.

The Pennsylvania DER has fined Sun $10,000 for this incident.

Flow Diagram of Sun FCC Process .



6. INSPECTION OF FCC UNIT

Art Meritt and Mike Hennigan then took us on an inspection of the FCC unit. We inspected the control room for the FCC process, the controls for the ESP, the CEM, and the area around the unit. The CEM appeared to be in good working order and was reading between 5-10% opacity, which we confirmed by observation of the main stack. The upper chamber of the ESP was on but the lower chamber was not receiving any power and hasn't been electrified since last August. It is scheduled to be repaired in October 1990 and until then the flue gas going through the lower precipitator is cleaned only by the series of baffles in the lower precipitator.

7. DISCUSSION

The rebuilding of the inside of the bypass stack and the ability of Sun to now inspect it should prevent a reoccurence of an incident like the one last August. However, since the lower ESP is not powered Sun could be in violation of PA regulation 123.13(c)(1)(ii). This regulation requires that no one can permit the emission of particulate matter into the atmosphere from any process in 123.13(b)(1)(which includes Petroleum Refining(catalytic cracking) that exceeds the rate determined by the formula A = 600/E. Where A are allowable emissions in grains per dry standard cubic feet and E is effluent gas volume in dry standard cubic feet per minute. Using the 1987 data from a stack test done by AirNova Inc. E is 287,007 dscfm which makes the allowable emissions 0.021 gr/dscf. According to the stack test the emissions ranged from 0.014 to 0.021 gr/dscf with the ESP in full operation and from 0.038 to 0.075 gr/dscf with the ESP inoperative. If you interpolate this could mean that the emissions range from 0.026 to 0.048 gr/dscf with one of the two ESP chambers operative.

8.CONCLUSION

Future incidents of the type which occured in August of 1988, should not be repeated. However Sun is probably in violation of PA regulation 123.13(c)(1)(ii). Their true emissions, with 1 of the 2 precipitator chambers operative, will be determined by the stack test scheduled to be done to the ESP, in its present operating condition, by the end of February 1990.

§ 123.12. Incinerators.

No person shall cause, suffer, or permit the emission to the outdoor atmosphere of particulate matter from any incinerator, at any time, in such a manner that the particulate matter concentration in the effluent gas exceeds 0.1 grains per dry standard cubic foot, corrected to 12% carbon dioxide.

§ 123.13. Processes.

(a) The provisions of subsections (b) and (c) shall apply to all processes except combustion units and incinerators.

(b) No person shall cause, suffer, or permit the emission into the outdoor atmosphere of particulate matter from any process listed in the following table, at any time, either in excess of the rate calculated by the formula set forth in paragraph (2) or in such a manner that the concentration of particulate matter in the effluent gas exceeds 0.02 grains per dry standard cubic foot, whichever is greater:

(1) *Table.*

Process	Process Factor, F (in pounds per ton)
Carbon black manufacturing	500 (product)
Charcoal manufacturing	400 (product)
Paint manufacturing	0.05 (pigment handled)
Phosphoric acid manufacturing	6.0 (P_2O_5 produced)
Detergent drying	30 (product)
Alfalfa dehydration	30 (product)
Grain elevators	
(loading or unloading)	90 (grain)
Grain screening and cleaning	300 (grain)
Grain drying	200 (product)
Meat smoking	0.01 (meat)
Ammonium nitrate manufacturing	
(granulator)	0.1 (product)
Ferroalloy production furnace	0.3 (product)
Primary iron and/or steel making:	
Iron production	100 (product)
Sintering—windbox	20 (dry solids feed)
Steel production	40 (product)
Scarfing	20 (product)
Primary lead production:	
Roasting	0.004 (ore feed)
Sintering—windbox	0.2 (sinter)
Lead reduction	0.5 (product)
Primary zinc production:	
Roasting	3 (ore feed)
Sintering—windbox	2 (product)
Zinc reduction	10 (product)
Secondary aluminum production:	
Sweating	50 (aluminum product)
Melting and refining	10 (aluminum feed)

Brass and bronze production (melting and refining)	20 (product)
Iron foundry:	
Melting:	
Five tons per hour and less	150 (iron)
More than five tons per hour	50 (iron)
Sand handling	20 (sand)
Shake-out	20 (sand)
Secondary lead smelting	0.5 (product)
Secondary magnesium smelting	0.2 (product)
Secondary zinc smelting:	
Sweating	0.01 (product)
Refining	0.3 (product)
Asphaltic concrete production	6 (aggregate feed)
Asphalt roofing manufacturing:	
(felt saturation)	0.6 (asphalt used)
Portland cement manufacturing:	
Clinker production	150 (dry solids feed)
Clinker cooling	50 (product)
Coal dry-cleaning	2 (product)
Lime calcining	200 (product)
Petroleum refining	
(catalytic cracking)	40 (liquid feed)
Pressed, blown, and spun glass;	
glass production melting furnaces	50 (Fill)
Sole heated nonrecovery coke oven	20 (coal charged/oven)
By-product coke production:	
pushing operation	1 (coke pushed)

(2) *Formula.*

$A = 0.76E^{0.42}$, where:

A = Allowable emissions in pounds per hour.

E = Emission index = F x W pounds per hour.

F = Process factor in pounds per unit, and

W = Production or charging rate in units per hour.

The factor F shall be obtained from the table in paragraph (1) of this subsection. The units for F and W shall be compatible.

(3) *Allowable emissions.* Allowable emissions under this subsection are graphically indicated in Appendix B to this Chapter.

(c) For processes not listed in subsection (b)(1) of this section, including but not limited to coke oven battery waste heat stacks and autogeneous zinc coker waste heat stacks, the following shall apply:

(1) *Prohibited emissions.* No person shall cause, suffer, or permit the emission into the outdoor atmosphere of particulate matter from any process not listed in subsection (b)(1) of this section in such a manner that the concentration of particulate matter in the effluent gas, at any time, exceeds any of the following:

(i) 0.04 grains per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

(ii) The rate determined by the formula:

$A = 6000E^{-1}$, where:
A = Allowable emissions in grains per dry standard cubic foot, and
E = Effluent gas volume in dry standard cubic feet per minute,

when E is equal to or greater than 150,000 but less than 300,000.

(iii) 0.02 grains per dry standard cubic foot, when the effluent gas volume is greater than 300,000 dry standard cubic feet per minute.

(2) Allowable emissions. Allowable emissions under this subsection are graphically indicated in Appendix C to this chapter.

Source

The provisions of section 123.13 amended September 16, 1980, effective September 27, 1980, 10 Pa. B. 3788.

SULFUR COMPOUND EMISSIONS

§ 123.21. General.

(a) This section shall apply to all sources except those subject to other provisions of this Article, with respect to the control of sulfur compound emissions.

(b) No person shall cause, suffer, or permit the emission into the outdoor atmosphere of sulfur oxides, from any source, in such a manner that the concentration, at any time, of the sulfur oxides, expressed as SO_2, in the effluent gas exceeds 500 parts per million, by volume (dry basis).

§ 123.22. Combustion units.

(a) *Non-air basin areas.*

(1) *General provision.* No person shall cause, suffer, or permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO_2, from any combustion unit, at any time, in excess of the rate of four pounds per million B.t.u. of heat input over any one-hour period except as provided for in paragraph (4) of this subsection.

(2) *Commercial fuel oil.* No person shall, at any time, offer for sale, deliver for use, exchange in trade, cause the use of, suffer the use of, or permit the use of commercial fuel oil in non-air basin areas which contains sulfur in excess of the applicable percentage by weight set forth in the following table:

Grades Commercial Fuel Oil	*% Sulfur*
No. 2 and lighter (viscosity less than or equal to 5.820cSt)	0.5
No. 4, No. 5, No. 6, and heavier (viscosity greater than 5.82cSt)	2.8

Steve Martini	Sun Risk Manager	447-1176
Jeannine Kubli	EPA environmental eng	597-9839
Jim Collins	EPA	597-1194
Mike Giuranna	EPA	597-8336
Laura Grossi-Tyson	Sun R+M Legal	(215) 977-6235
Michael Hennigan	Sun Operations	(215) 447-1212
Jeff Peters	Sun R+M Public Relations	" " 1009
Barry Morlock	" " Maintenance Dept	" -1462
Art Merritt	" Environmental	447-1198
Neil O'Connor	DER-Pa Air Quality	270-1920

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Submittal of Inspection Reports **DATE:** JAN 30 199

FROM: Victor Guide, Chief FOR
Philadelphia Operations Section(3ES11)

TO: Bernard Turlinski, Chief
Air Enforcement Branch(3AM20)

Attached is an Inspection Report from the following facility:

Facility	CDS number	AE Contact
Sun Oil Refining & Marketing	39-2360-00026	Jeanine Kubli

If you have any questions please call me.

RECEIVED
JAN 31 1990
AIR ENFORCEMENT BRANCH
EPA Region III

RECEIVED
FEB 07 1990
AIR ENFORCEMENT BRANCH
EPA Region III

Established 1962

215 485-3536

Sykes & Sons, Inc.

2827 W. Third Street

Chester, Pennsylvania 19013

Subject: INSPECTION AND STATUS REPORT

Date: January 16, 1990

From: R.J. Sykes, Jr.

To: Howard Nickle

Location: Marcus Hook, PA

Date of Inspection: January 12, 1990 Item No. **316**
In-service Inspection

1. GENERAL

a. Tank is a covered floating roof type.
b. Tank is of all welded construction.
c. Nominal diameter of tank: 110'-0"
Nominal height of tank: 48'-0"
d. Tank does have an API standard 650 name plate.
e. Tank was built in 1976 by Fisher Tank Co.

2. SHELL AND SHELL CONNECTIONS

a. Paint is in poor condition. Stencil:9/80
b. Tank shell is six rings high. Readings (taken at steps with paint intact) are as follows:

1st bottom	.740	4th	.340
2nd	.625	5th	.285
3rd	.495	6th	.260

c. There is product showing on the 6" gate valve stem. (S.W. side of tank).
d. First shell ring connections are as follows:
1 -36" round manhole
1 -12" connection/blind flanged.
1 10" thermal relief showing sign of product.
1 -6" stripper, valve stem showing product.
No bonding cable on above 10" and 6" connections.
1 -3/4" electric temperature probe connection.
2 -24" round manhole.
1 -10" connection, gate valve, blind flanged.
1 -6" foam connection.
1 -6" stripper.
1 -14" connection.
e. There is no manual read temperature probe.
f. There is a build up of soil and stone on the outer bottom sketch plates, and shell

3. STAIRS, LADDERS, PLATFORMS

   a. Grating on top platform, cone roof level, needs to be fastened down with clips. All other items appear in good condition.

4. FIREWALL AND FIREWALL AREA

   a. Area is well maintained.
   b. Area is of soil and stone construction.
   c. There is one tank in area.
   d. Drainage away from tank appears good.

5. CONE ROOF

   a. Readings: .180 min. - .215 max.
   b. Paint is in poor condition.
   c. Roof connections:
      1 -4" welded high level alarm.
      3 -Welded 3" connections. Pipe has threaded cap.
      3 -20" manholes.
      1 -24" center free vent.
      1 -Target gauge connection.
      1 -Data gauge connection.
   d. Slope on roof is good for water drainage.

6. FLOATING ROOF

   a. Roof is a bolt together aluminum type, with no topside pontoons.
   b. Roof support legs are pinned at high level. Two roof support leg pins were missing. (3/8" aluminum bolt by 3" long).
   c. Roof has a single foam seal.
   d. There is a buckle on the roof with some bolts missing.
   e. Two areas show product on the topside of deck. One area is ripped at the vertical ladder.
   f. Seal has debris (scale and rust) on it. At some areas, the seal shows signs of dry rot.

Subject BENZENE STORAGE REGULATIONS

Interoffice Correspondence

Date January 21, 1990

Location Marcus Hook

From A. D. Meritt

To H. Nickle

The following tanks over 10,000 gallons have been registered with EPA as benzene storage tanks for the Marcus Hook Refinery. These tanks are now the only tanks over 10,000 gallons in which we may store benzene. Tanks numbers 619, 620, 621, 622, 623, 624 and 625.

These tanks all have internal floating roofs and liquid mounted seals.

Inspection Requirements

1) Visually look at floating roof and seals once every 12 months through manholes and hatches in fixed roof.

2) Visually look at floating roof, seals gaskets, etc. close-up every 10 years with the tank empty. EPA must be notified 30 days in advance of this inspection. Unplanned inspections (following unplanned repairs) only require 7 days notice.

Reporting - will be done by Environmental.

3) Each annual inspection requires a report to be made to EPA describing the condition of the tank elements and necessary repairs. Forward information to Environmental.

4) Each 10 year inspection requires a report to EPA. Forward information to Environmental.

Records

5) All reports to EPA of inspections and maintenance.

6) All tanks, regardless of size, containing benzene require a record of dimensions and capacities.

All openings in floating roof shall adhere to paragraph (5) on page 38078. Basically this means that any opening must have some kind of fabric seal or gasketed cover. We have 9 years or the first 10 year inspection to meet these requirements, whichever is first.

Detailed regulations are attached.

Arthur D. Meritt

ADM:erg
Attachment
cc: L. Grossi-Tyson
S. Martini
A. Vanacore
J. Rossi
H. Meixner
D. Rocklage
File: Benzene Neshap Report
ADM-HN22

Various Dates

027

Established 1962

Sykes & Sons, Inc.

2827 W. Third Street

Chester, Pennsylvania 19013

Subject: Tank INSPECTION AND STATUS REPORT

Date: January 15, 1990

From: R.J. Sykes, Jr.

To: Howard Nickle, Sunoil

Location: Marcus Hook, PA

Date of Inspection: January 12, 1990

Item No. 325
In-service Inspection

1. GENERAL

a. Tank does not have a number painted on shell.
b. Age and manufacturer of tank was unknown at time of inspection.
c. Nominal diameter: 120'-0".
   Nominal height: 58'-5".
d. Tank is a covered floating roof type.
e. Tank is of all welded construction.

2. SHELL AND SHELL CONNECTIONS

a. Shell connections are as follows:
   3 -24" round manheads.
   1 -36" round manhead.
   3 -4" flanged connections-gate valve/blind flange.
   1 -1½" electric temperature probe connection.
   1 -1½" connection on 45° angle and valve is plugged.
   1 -8" low level suction.
   1 -14" connection used as both fill and suction.
   1 -4" welded connection. Gate valve and blind flanged-no reinforcing pad.
   1 -6" water draw off connection. Bonding cable is intact on the fill and suction line. Tank shell is 7 rings high. Readings are as follows: (taken at stairs with paint intact)

1st	bottom 1.045	4th	.560	7th	.280
2nd	.845	5th	.385		
3rd	.690	6th	.320		

b. Temperature probe and data gauge appear new.
c. Electric high level alarm appears new.
d. There are no emergency overflow vents on top shell ring.
e. Paint is in good condition.
f. There is sand build up on outer sketch plates and shell.
g. Tank does not have a manual read temperature probe.

3. FIREWALL AND FIREWALL AREA

a. Area is well maintained.
b. Area is of stone and soil construction.
c. Lines are above ground, except where they meet the firewall.
d. There is one tank in the firewall area.
e. Drainage away from tank appears good.

4. STEEL CONE ROOF

a. Thickness readings (6 taken) are: .195 min. - .205 max.
b. Paint is in good condition.
c. Roof has good slope for water drainage, with no apparent low areas. (Water traps).
d. Roof connections are as follows:
   1 -electric high level alarm.
   1 -24" center free vent.
   4 -20" round manholes. One used for data gauge.
   1 -36" round manhole (vertical ladder access) hinged.

5. FLOATING ROOF

a. Single deck, single seal type. (Pan type floater).
b. Much product and water on top of roof. Up to 2" deep-180 across from ladder.
c. Seals at roof columns failed. Foam seal at shell shows dry rot.
d. Outer pontoons show product and water.
e. No bonding cable from floating roof to shell.
f. No emergency overflow vents at top and side shell.
g. Two manhole access covers were not in place.
h. Thickness readings: .185 min. - .195 max.
i. There is no safety belt device on the vertical ladder.

6. STAIRS, RAILINGS, PLATFORMS

a. A few stair treads are bent. All appear in good condition.
b. Paint is in good condition.

RECOMMENDATIONS

1. Tank should be taken from service and have roof repaired.
2. Side shell vents, at present design, may allow water in, if there is a strong wind. Water proof vent covers.
3. Install bonding cable on floating roof.
4. Paint tank number on the side shell.
5. Install emergency overflows on top shell ring.
6. Install new roof seals.
7. 4" connection (over fill and suction line) should have a reinforcing pad.

ENSR

Formerly Sunohio

LSC TRANSFORMER

ENSR Operations
1501 Raff Rd. S.W.
Canton, Ohio 44710
216-477-3474

November 8, 1989

CONFIDENTIAL

Mr. Tom Knight
Sun Refining and Marketing Co.
P.O. Box 426
Marcus Hook, PA 19061

Dear Mr. Knight:

We are tracking the leaching of your transformer until the reclassifiable levels required by the EPA have been attained. Once the PCB leaching rate has been reduced to acceptable levels, the system is turned off and the 90-day EPA reclassification period begins. You will receive this report within 48 hours from the time we receive the results from the lab.

Thank you for using System 50 reclassification service. If you have any questions, please call your Project Engineer.

Sincerely,

ENSR OPERATIONS

Jan Sickler

Project Engineer
System 50

ad

Enclosure

cc: Rick Gorski

ENSR

Formerly Sunohio

CHEMICAL ANALYSIS REPORT

ENSR Operations
1700 Gateway Boulevard S.E
Canton, Ohio 44707
216-452-0837

CONFIDENTIAL

SUN REFINING
PO BOX 426
MARCUS HOOK , PA 19061

DATE: November 06, 1989
ATTN: MR. TOM KNIGHT

CUSTOMER NUMBER: 350057
UNIT NUMBER:
SERIAL NUMBER: 21079A01
PROC. NO: 12-149-0320-020389

GALLONS: 305
LOCATION:
STATUS: Processor Installed
PROC. STARTUP: 03/04/89

Fluid	Sample Date	PCB Conc.	ACLR	Status
ASK	03/03/89	940,000.00	1254	A
SYS	03/03/89	7,370.00	1254	B
SYS	05/16/89	2.40	1254	C
SYS	08/25/89	1.07	1254	C

CERTIFIED BY: R A Gibas
Residue Analyst

APPROVED BY: Jon Beckh
Project Manager

0102411

ALL SAMPLES WILL BE DISPOSED OF AFTER SIXTY DAYS FOLLOWING ANALYSIS. PLEASE CONTACT THE LAB IF YOU REQUIRE ADDITIONAL SAMPLE STORAGE TIME.

ER-AQ-7

Neil - copy 1st pg.
File 23-000-133

(304)

OK

HSO

REGION NORRISTOWN
DISTRICT Del-Ches
AP FILE NO. 23-000-133

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONEMTNAL RESOURCES
BUREAU OF AIR QUALITY CONTROL
SEMI-ANNUAL
INSPECTION VERIFICATION REPORT
FOR MAJOR FACILITIES

COMPANY NAME Sun Refinery DATE INSPECTED October 31, 1989

OWNERS NAME Sun Co INSPECTED BY N. O'Connor

LOCATION Marcus Hook, Del Co REVIEWED BY RLR

NEXT INSPECTION DATE

OFFICIAL(S) CONTACTED Art Meritt TITLE Envir. Engineer
Dave Todd testing Consultant

NONCOMPLYING SOURCES (use back if necessary) STANDARD(S) VIOLATED

Electrostatic Ppt. FCC unit ...... Possibly §123.13; (Probably) §127.25

UDex-Benzene Area {odor - Tank Sumps; odor - Vol Acc. Sump} ...... §121.7/§123.1(a)/Section 8 + Act (over)

......

......

SOURCES NOT OPERATING (use back if necessary) REASON(S) (no production, malfunction, breakdown, etc.)

......

......

FOLLOW-UP ACTIONS REQUIRED the origional FCC by-Pass stack has been torn down — A new stack is currently being installed with an inspection/clean-out port - allowing entrance. this had not been the case for the origional stack and was probable cause for the degree of deterioration before correction.

COMMENTS (continue on back if necessary) The Boilerhouse Area; UDex Area; Ten Plant Area, were all visited with a subequent walk-thru. A spot check was made for Benzene Bardge Loading; Also in passing covered separators; Finally a slow drive-thru of the major (other) production systems and loading ope[rations]

#30 (innocent until proven guilty!) (* letter to be sent DER)

UDex — Benzene ① Mft Area as below under Reformer
② Storage Area
③ Separation - No odors detected.

Tank Storage Area - And Pump Transfer plateform
Diffuse sweet odor - Moderate - Loosly associated with pump sumps but possably from Transfer Lines upwind leading to the pumps.

Reforming - V01 Accumulator (Purging)
(Near 17-2A-77 Sump Area)
Odors - Suggestive of Naptha but with a tinge of other non-specific sweet odors

Neil O'Connor

* By Passing Aug

Sun Oil Inspection — 1989

FCC Unit ESP's		AC-V	DC-KV	AC-AMPS	DC-M...
Buell inlet center	N	LATE SUMMER DOWN — NOT IN OPERATION			
" " "	S				
Buell outlet center	N	*DOWN CORROSION of BLOWER AREA			
" " "	S	INVASION of PARTICULATE			
Buell outlet	N	STREAM INTO			
	S	(Soot Blow... 3X SH... SUPPLEMENT... CONTROL... VISIBLE E...			
Lodge outlet	N	NOT IN OPERATION			
" "	S				
Lodge center	N	350	21	50	370
" "	S	430	52	150	340
Lodge inlet	N	330	20	32	130
" "	S	340	51	32	78
Buell inlet	N	NOT IN OPERATION			
" "	S				

SO_2 meter at 10 plant 417 ppm %S * {Derived / Alternat...

*Note meter reads 2x real value of %S 0.23 feed IN

Opacity monitor — Model — Installed

Visual opacity 10% time 2:05pm

Fuel Type GAS/Oil + Resid. Amount

Alternate fuel Amount

other sources NO BARGES

102 Benzene Loading Loading yes ☐ No ☐ Emission NONE opaci NONE

Comments:

103 Nereshoff Furnace fuel ~~Outlet Operation~~ Amt

Opacity

Comments: DISCONTINUED – Deleted

104 12 Plant Flare In use ☐ fuel 15% Opac.

No ☐ Amt

Opacity

Comments:

105 10 plant flare fuel 15% Opac.

Amt

Opacity

Comments:

10/31/5?

	7 AM.	11AM	3PM	7PM	11PM	3AM	7AM
#1 Boiler	62	61	61				
#2 Boiler	66	65	65				
#3 Boiler STM	58	56	56				
#4 Boiler	S/D						
#5 Boiler	88	85	85				
#6 Boiler	120	114	114				
#7 Boiler	215	205	205				
Cogen	224	223	223				
Total Steam M#/hr	833	809	809				
#1 Boiler Fuel	67	70	70				
#2 Boiler	66	65	65				
#3 Boiler	86	83	83				
#4 boiler	S/D						
#5 Boiler	114	117	117				
#6 Boiler	123	87	87				
#7 Boiler							
Cogen	322	296	296				
Total Gas MSCFH	777	718	718				
#1 Boiler							
#2 Boiler							
#3 Boiler							
#4 Boiler							
#5 Boiler							
#6 Boiler							
#7 Boiler							
Total Hi-Vis GPH							
#1 Boiler							
#2 Boiler							
#3 Boiler							
#4 Boiler							
#5 Boiler							
#6 Boiler	160	150	150				
#7 Boiler							
Total B.C.							

(222M lbs of steam/hr)(71,000 #/hr to turbine)
230,000 ft³ Nat. gas + 650,000 ft³ H₂ (80%)

15 Boiler House

Date:

Total Gas

Total B.C.

S.O.

458 Tk Level

Pressure E.
W.

1 copy to Yield
1 copy to Office

various dates

(151)

Department of Environmental Resources	**NPDES Compliance Inspection Report**	Bureau of Water Quality Management

W-44

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 PA 0011046 11	12 8?0928 17	18 R	19 5	20 2

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Sun Marketing and Refining Company (C) Box 426 Marcus Hook PA 19061	0930 9-28-89	6-25-86
Municipality: Marcus Hook / County: Delaware	Exit Time/Date: 1200 9-28-89	Permit Expiration Date: 6-25-91

Name, Address of Responsible Official	Title	Telephone	Contacted
Malcolm Eliot	Refinery Manager	447-1000	Yes ☐ No ☒

Section C: Areas Evaluated During Inspection
(S = Satisfactory, I = Improvement Needed, U = Unsatisfactory, D = Does Not Apply, Blank = Not Evaluated)

___ Permit Verification	___ Flow Measurement	S Effluent/Receiving Waters
___ Compliance Schedule	___ Laboratory/QA	S Operation/Maintenance
___ Records/Reports	___ Self-Monitoring Program	___ Pretreatment
___ Other (Specify):		

Section D: Summary of Violations/Recommendations/Comments (Attach additional sheets if necessary)

A NPDES inspection was conducted today. During a routine sampling from discharge 301 and 301 were collected, as well as from the river intake.

The Delaware River was examined and no sheen was evident at any of the docks. Dock 2A looks OK, groundwater recovery is still in progress; ~45,000 gallons of product have been collected, so far. There is a 14 inch crude line at the beginning of dock 2A that has heavy staining & some free product on a small pool of water. Sun is aware of the problem. It should be cleaned up

Inspector Name	Inspector Signature	Title	Date / Telephone
Richard Breitenstein	Richard Breitenstein	DWQS	9-28-89 270-1134
Name of Person Interviewed	**Signature of Person Interviewed**	**Title**	**Date / Telephone**
JUDY S BRACKIN	Judy S Brackin	Sr Environmental Engineer	9/28/89 447-1959

THIS DOCUMENT IS OFFICIAL NOTIFICATION THAT A REPRESENTATIVE OF THE DEPARTMENT OF ENVIRONMENTAL RESOURCES, BUREAU OF WATER QUALITY MANAGEMENT, INSPECTED THE ABOVE FACILITY. THE FINDINGS OF THIS INSPECTION ARE SHOWN ABOVE AND ON ANY ATTACHED PAGES.

ANY VIOLATIONS WHICH WERE UNCOVERED DURING THE INSPECTION ARE INDICATED. VIOLATIONS MAY ALSO BE DISCOVERED UPON EXAMINATION OF THE RESULTS OF LABORATORY ANALYSES OF THE DISCHARGE AND REVIEW OF DEPARTMENT RECORDS. NOTIFICATION WILL BE FORTHCOMING, IF SUCH VIOLATIONS ARE NOTED.

REGIONAL OFFICE

Additional Comments

as soon as possible.

Middle creek after the dam has a sheen and a scum in the stagnant area. They are sandblasting near the dam today. There are 3 booms directly after the dam. The creek after the Linwood Bypass looks OK with a slight sheen + scum area. There are 2 booms in place directly before the straw barrier, 1 absorbant + 1 containment. There is a slight sheen getting through the straw barrier but nothing is visible downstream at the Avenue D bridge in Delaware. One absorbant boom is in place after the straw barrier.

The VOC separators look alright, but the effluent from the Delcora final separators is heavily sheened. A boom should be placed to try + remove some of the sheen. There is free oil in all of these separators. South Jersey Pollution Control is on site + removing the oil. The separator area was totally flooded last week and may have contributed to the heavy oil. The rock bank in middle creek doesn't have a lot of staining.

Facility is planning to do away with the middle Creek dam and the entire creek upstream. This will take several years to be completed.

Will also install skimmers in final separators.

Facility is planning a meeting in October '89 with Sun, PADER, U.S.C.G., DNREC + any other essential groups to discuss environmental issues at Sun Refinery.

Outfalls 004, 005 + 007 from the tank farms (Road Boyd + #2) come back to the Refinery. 006 is not used anymore. 401 is not used anymore either. 501 is at the middle Creek where the Linwood Bypass discharges.

Permit No.: PA 0011096
Date: 9-28-89

REGIONAL OFFICE

ER-BWQ-168

Department of Environmental Resources	**NPDES Compliance Inspection Report**	Bureau of Water Quality Management

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 PA0011096 11	12 890628 17	18 C	19 5	20 2

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Sun Marketing and Refining Company P.O. Box 426 Marcus Hook PA 19061	0950 6-28-89	6-25-86
Municipality Marcus Hook / County Delaware	Exit Time/Date 1445 6-28-89	Permit Expiration Date 6-25-91

Name, Address of Responsible Official	Title	
Malcolm Flint	Refinery Manager	
	Telephone 447-1000	Contacted Yes ☐ No ☒

Section C: Areas Evaluated During Inspection
(S = Satisfactory, I = Improvement Needed, U = Unsatisfactory, D = Does Not Apply, Blank = Not Evaluated)

S Permit Verification	Flow Measurement	S Effluent/Receiving Waters
Compliance Schedule	Laboratory/QA	S Operation/Maintenance
I Records/Reports	S Self-Monitoring Program	Pretreatment
Other (Specify):		

Section D: Summary of Violations/Recommendations/Comments (Attach additional sheets if necessary)

An NPDES Compliance evaluation was conducted today. The Presidente Rivera is docked and is boomed. The shore looks clean at Sun, and the river is free of oil, except that which is within the booms.

Samples were collected from outfall 201, 301 + the river intake. The flow meter for 201 is out of service still + should be fixed.

There is a heavy rainbow sheen after Middle Creek Dam. The banks are also oil stained. The bank will be

Inspector Name	Inspector Signature	Title	Date / Telephone
Richard Breitenstein	Richard Breitenstein	WQS	6-28-89 270-1184
Name of Person Interviewed	**Signature of Person Interviewed**	**Title**	**Date / Telephone**
Judy S Brackin	Judy S Brackin	Sr Environmental Engineer	6-28-89 447-1959

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REGIONAL OFFICE

Department of Environmental Resources	**NPDES Compliance Inspection Report**	Bureau of Water Quality Management

Additional Comments

replaced soon. Booms are in place after the dam and on either side of the straw barrier. The barrier itself needs to be changed as some sheen is getting through. Where middle creek enters the Delaware there is a sheen.

The shoreline by the ethylene complex (in Delaware) has some oil on it.

The Delcora effluent has a sheen + could use a boom. The final separators will eventually get skimmers installed. The sewer system by the 17 plant is being worked on to eliminate grading problems.

There is a lot of staining throughout the facility. This should be controlled as best as possible + the worst areas should be cleaned up

There is a rainbow sheen at the seepage area by #2 Dock. Booms are in place + South Jersey Pollution Control pads it if necessary. Will probably install groundwater wells soon to determine source

Recovery well is still in use. 38,000 gallons recovered so far.

The Delcora gate valve is now locked at all times.

Permit No.: PA 0011096
Date: 6-28-89

REGIONAL OFFICE

Department of Environmental Resources	**NPDES Compliance Inspection Report**	Bureau of Water Quality Management

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 PA0011196 11	12 89 03 23 17	18 R	19 S	20 2

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Sun Refining and Marketing Company P.O. Box 426 Marcus Hook PA 19061	0945 3-23-89	6-25-86
Municipality Marcus Hook / County Delaware	Exit Time/Date: 1230 3-23-89	Permit Expiration Date: 6-25-91

Name, Address of Responsible Official	Title	Telephone	Contacted
Malcolm Flint	Refinery Manager	447-1000	Yes ☐ No ☒

Section C: Areas Evaluated During Inspection

(S = Satisfactory, I = Improvement Needed, U = Unsatisfactory, D = Does Not Apply, Blank = Not Evaluated)

_____ Permit Verification	_____ Flow Measurement	S Effluent/Receiving Waters
_____ Compliance Schedule	_____ Laboratory/QA	S Operation/Maintenance
_____ Records/Reports	_____ Self-Monitoring Program	_____ Pretreatment
_____ Other (Specify):		

Section D: Summary of Violations/Recommendations/Comments ***(Attach additional sheets if necessary)***

An NPDES sampling inspection was conducted today. Samples were collected from discharge points 201 and 301. These two discharges combine to form the Linwood bypass, which discharges to Middle Creek. This outfall looks OK. The booms and straw bridge downstream need to be replaced; some oil is getting through. South Jersey Pollution Control is on site skimming oil of separators and wherever else necessary. The oil is stored in a slop oil tank and reused. The water is sent

Inspector Name	Inspector Signature	Title	Date / Telephone
Richard Breitenstein	Richard Breitenstein	WQS	Date 3-23-89 Telephone 270-1184

Name of Person Interviewed	Signature of Person Interviewed	Title	Date / Telephone
Thomas Zale	Thomas Zale	Envir. Mgr.	Date 3/23/89 Telephone 447-1139

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REGIONAL OFFICE

Department of Environmental Resources	**NPDES Compliance Inspection Report**	Bureau of Water Quality Management

Additional Comments

back to Middle Creek. all 7 final separators are in service, with thick stagnant oil on most of them. When the weather warms, it will be removed by South Jersey. Where middle Creek enters the Delaware River (in Delaware) there is some sheen and debris entering. It is from dredging operations near the dock area. A boom is in Middle Creek to prevent any sheen from travelling up the creek.

The river intake water is screened and any sludge is sent to a settling tank which is periodically pumped out. The sludge is sent to a filter press. The cake is landfilled and the water goes to Middle Creek. On Tuesday, 3-21-89 the Delcora gate valve was noticed open a bit. This was shut down. Some oil had gotten past the middle Creek dam and down the creek staining is evident along the banks. The reason it was open is not known. a alarm system or a local light will be installed to prevent a reoccurence. They are also going to add another boom right after the dam to surround the gate valve area. Some heavy oil still remains.

Facility is sending Delcora 9-10 mgd of separator effluent.

Dock 2A has some oil near the bulkhead which is contained by booms. The oil is coming from leaking underground pipelines that extend to the Delaware River. These pipes will be removed in the future, more aboveground pipes will be installed. The groundwater recovery is still in progress. Are getting very sporadic recovery lately. outfalls 005, 006 + 007 are combined and enter Middle Creek next to Hewes avenue.

Permit No.: PA 0011096
Date: 32389

REGIONAL OFFICE

ER-BWQ-168

Department of Environmental Resources	**NPDES Compliance Inspection Report**	Bureau of Water Quality Management

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspection Type	Inspector	Fac Type
1 [ ] 2 [5]	3 [PA0011096] 11	12 [881129] 17	18 [R]	19 [D]	20 [ ]

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Sun Refining and Marketing Company P.O. Box 426 Marcus Hook, PA 19061	1015 11-29-88	6-25-86
Municipality: Marcus Hook; County: Delaware	Exit Time/Date: 1405 11-29-88	Permit Expiration Date: 6-25-91

Name, Address of Responsible Official	Title	
Malcolm Flint	Refinery Manager	
	Telephone: 447-1000	Contacted: Yes [ ] No [X]

Section C: Areas Evaluated During Inspection
(S = Satisfactory, I = Improvement Needed, U = Unsatisfactory, D = Does Not Apply, Blank = Not Evaluated)

____ Permit Verification	____ Flow Measurement	S Effluent/Receiving Waters
____ Compliance Schedule	____ Laboratory/QA	S Operation/Maintenance
____ Records/Reports	____ Self-Monitoring Program	____ Pretreatment
____ Other (Specify):		

Section D: Summary of Violations/Recommendations/Comments (Attach additional sheets if necessary)

An NPDES inspection was conducted this date. Cold + Windy. Outfall 101 was not discharging. There is more oil than normal in the middle creek impoundment area. South Jersey Pollution control is on site every day to remove any oil in the impoundment. They also replace booms + absorbants whenever necessary. Outfalls 501 + 301 were discharging to middle Creek. Samples were collected. There doesn't appear to be much of a sheen near the outfall. Booms are continually in place to catch any sheen that would appear. Water quality below the

Inspector Name	Inspector Signature	Title	Date / Telephone
Richard Breitenstein	Richard Breitenstein	WQS	11-29-88 270-1184
Name of Person Interviewed	**Signature of Person Interviewed**	**Title**	**Date / Telephone**
JUDY S BRACKIN	Judy S Brackin	RESEARCH Engineer	11-29-88 447-1185

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REGIONAL OFFICE

Department of Environmental Resources	**NPDES Compliance Inspection Report**	Bureau of Water Quality Management

Additional Comments

strawbridge looks OK. The pump by the transport dock is still in operation, as are the product recovery + groundwater collection pumps by 2A dock. There is some oil near 2A dock by the bulkhead. South Jersey is trying to contain it with booms + skimmers. Target Environmental are trying to find the source of this oil. The containment area by the acid/base pumps is full + needs to be emptied before more precipitation occurs. also some water in the acid tank containment area.

006 is totally dismantled, no more to #2 Tank Farm- 006 discharge point is in use, but monitoring isn't required anymore. It is emptying stormwater only; no sheen is present. 007- is still in use + is monitored. Construction is almost complete (end of 1988) on the piping, separator [redacted] Water will either be sent to Delcora (via Sun's API's) or will be tanked out until completion of facilities.

Read-Boyd Farm- 004 is coming back to Sun, the discharge is eliminated. 005 wasn't discharging today and hasn't for several weeks it can be used if necessary but isn't expected to be. Construction here is also scheduled for end of 1988. no discharge will occur after 1988. Will be pumped out by truck if necessary.

Permit No.: PA 0011096
Date: 11-29-88

REGIONAL OFFICE

PX — Refinery - CEI

Department of Environmental Resources	**NPDES Compliance Inspection Report**	Bureau of Water Quality Management

Section A: National Data System Coding

Transaction Code		NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [ ]	2 [5]	3 PA0011096 11	12 871217 17	18 [4]	19 [ ]	20 [ ]

Section B: Facility Data

Name and Location of Facility Inspected
Sun Refining and Marketing Company
P.O. Box 426 Marcus Hook, PA 19061

Municipality Marcus Hook Boro **County** Delaware

Entry Time/Date 12-17-87 1000
Exit Time/Date 12-17-87
Permit Effective Date 6-25-86
Permit Expiration Date 6-25-91

Name, Address of Responsible Official
Joseph D. Mazzei —
(same)

Title Refinery Mgr.
Telephone 447-1000
Contacted Yes [ ] No [X]

Section C: Areas Evaluated During Inspection

(S = Satisfactory, I = Improvement Needed, U = Unsatisfactory, D = Does Not Apply, Blank = Not Evaluated)

S	Permit Verification	S	Flow Measurement	S	Effluent/Receiving Waters
'	Compliance Schedule	S	Laboratory/QA	S	Operation/Maintenance
S	Records/Reports	S	Self-Monitoring Program	D	Pretreatment

___ Other (Specify): ___

Section D: Summary of Violations/Recommendations/Comments *(Attach additional sheets if necessary)*

Separators are undergoing various maintenance activities cleaning, gravel replacement, [illegible] spill prevention, etc. Water quality below strawbridge shows much improvement. The transport dock has [illegible] gravel replaced and containment curb [illegible] pump assembly still installed at [illegible] to pump run-off to the wastewater treatment plant. Product [illegible] and groundwater collection pumps

Inspector Name	Inspector Signature	Title	Date / Telephone
Ruth M. Plant	Ruth M Plant	Water Quality Specialist	Date 12-17-87; Telephone 215 270-1975
Name of Person Interviewed	**Signature of Person Interviewed**	**Title**	**Date / Telephone**
Theodore Stracowski	[signature]	Sr Envt Eng	Date 12/17/87; Telephone 447-1176

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Department of Environmental Resources	NPDES Compliance Inspection Report	Bureau of Water Quality Management

Additional Comments

HRE INSTALLEN AND BEING USED ON # 2 DOCK IN ACCORD WITH PLANS SUBMITTED. LOGS ON ALL RECOVERIES KEPT IN DOCK OFFICE.

Permit No.: PA 0011096

Date: 12-17-87

PA 1142

Genl. info. → (296)

REGION NORRISTOWN
DISTRICT Del-Ches
AP FILE NO. 23-000-135

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONEMTNAL RESOURCES
BUREAU OF AIR QUALITY CONTROL
SEMI-ANNUAL
INSPECTION VERIFICATION REPORT
FOR MAJOR FACILITIES

COMPANY NAME SUN REFINERY
DATE INSPECTED APRIL 25, 1989
OWNERS NAME SUN CORP.
INSPECTED BY MATT O'CONNOR
LOCATION MARCUS HOOK DEL. CO
REVIEWED BY RLR
NEXT INSPECTION DATE
OFFICIAL(S) CONTACTED ARTHUR MERRITT
TITLE ENVIR. ENGINEER

NONCOMPLYING SOURCES (use back if necessary)	STANDARD(S) VIOLATED
Racing fuel Leak @ Loading Term.	129.62(a) - NOV will be sent
BARGE-Interstate 53 Venting Gasline Vapors Thru Water While ON-Loading	~~§121.7 AND 123.1(a)~~ = Barge loading is not currently regulated. RLR

SOURCES NOT OPERATING (use back if necessary)	REASON(S) (no production, malfunction, breakdown, etc.)
UDEX-Benzene Mft	off Line AND Down for Service
Benzene Barge Loading	not scheduled

FOLLOW-UP ACTIONS REQUIRED A New Smoke Detector is Scheduled to be INSTALLED on the Boiler STACK. Fire school excessive Smoke were Reviewed with the Company and the need for Correct...

COMMENTS (continue on back if necessary) Boiler System AND Co-Gen System: All Eight Boilers ON Line: Gas usage 656 Mft³ (6), Oil 323 Gal/Hr (#6) Co-Gen ON Hydrogen gas @ 912 M ft³. Sulfur of Oil 0.08 → 0.0% ~~The~~ The SEPARATORS were visited and were tight. The Racing fuel Loading RACK was INSPECTED also The Barge Area AND the UDex plant (Closed + HARE 30/11 for spill at CAM II rack

DR Meshato CCMC

Neil O'Connor

Sun Oil Inspection — 198

FCC Unit ESP's		AC-V	DC-KV	AC-AMPS	DC-M.A
Buell inlet center	N	340	35	29	290
" " "	S	—	—	32	250
Buell outlet center	N	330	32	68	440
" " "	S	—	—	13	290
Buell outlet	N	—	5	—	—
	S	300	36	84	620
Lodge outlet	N	—	—	—	—
" "	S	—	—	—	—
Lodge center	N	350	21	50	370
" "	S	360	54	85	140
Lodge inlet	N	340	21	—	200
" "	S	—	—	—	—
Buell inlet	N	360	34	45	270
" "	S	—	—	28	90

SO_2 meter at 10 plant 350 ppm 371 MAVG % S * { DERIVED / ALTERNATE

*Note meter reads 2x actual value of %S

Opacity monitor Model Installed

Visual opacity 9 0% → 13% Time 456PM

Fuel Type GAS/Oil + Resid. Amount

Alternate fuel Amount

thru sources

102
Benzene Loading — Loading yes ☐ No ☐ — Emission NONE — opacity NONE

Comments:

103 Herreshoff Furnace — fuel — Amt — Opacity

Comments: DISCONTINUED – Deleted

104 12 Plant Flare — In use ☐ No ☐ — fuel — Amt — Opacity

Comments:

105 10 plant flare — fuel — Amt — Opacity

Comments:

REGION _____

DISTRICT _____

AP FILE NO. _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONEMTNAL RESOURCES
BUREAU OF AIR QUALITY CONTROL
SEMI-ANNUAL
INSPECTION VERIFICATION REPORT
FOR MAJOR FACILITIES

COMPANY NAME _____ DATE INSPECTED _____

OWNERS NAME _____ INSPECTED BY _____

LOCATION _____ REVIEWED BY _____

NEXT INSPECTION DATE _____

OFFICIAL(S) CONTACTED _____ TITLE _____

_____ _____

NONCOMPLYING SOURCES (use back if necessary) STANDARD(S) VIOLATED

_____ ..... _____

_____ ..... _____

_____ ..... _____

_____ ..... _____

_____ ..... _____

SOURCES NOT OPERATING (use back if necessary) REASON(S) (no production, malfunction, breakdown, etc.)

_____ ..... _____

_____ ..... _____

FOLLOW-UP ACTIONS REQUIRED _____

_____

_____

_____

COMMENTS (continue on back if necessary) _____

_____

_____

_____

_____

REGION _____

DISTRICT _____

AP FILE NO. _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONEMTNAL RESOURCES
BUREAU OF AIR QUALITY CONTROL
SEMI-ANNUAL
INSPECTION VERIFICATION REPORT
FOR MAJOR FACILITIES

COMPANY NAME _____ DATE INSPECTED _____

OWNERS NAME _____ INSPECTED BY _____

LOCATION _____ REVIEWED BY _____

NEXT INSPECTION DATE _____

OFFICIAL(S) CONTACTED _____ TITLE _____

_____ _____

NONCOMPLYING SOURCES (use back if necessary) STANDARD(S) VIOLATED

_____ ..... _____

_____ ..... _____

_____ ..... _____

_____ ..... _____

_____ ..... _____

SOURCES NOT OPERATING (use back if necessary) REASON(S) (no production, malfunction, breakdown, etc.)

_____ ..... _____

_____ ..... _____

FOLLOW-UP ACTIONS REQUIRED _____

_____

_____

_____

COMMENTS (continue on back if necessary) _____

_____

_____

_____

_____

Rick Sigmon

HAZARDOUS WASTE INSPECTION REPORT
TSD Facilities - Part A

Date of inspection Jan 28 1986 Time start 10^00 Time finish 3^00

Name of inspector Carol Kurtz

Company, installation name Sun Refining & Marketing Co Inc

Location Delaware Ave & Green St

County Delaware Municipality Marcus Hook

Identification number PAD 980550594

Name of responsible official Arthur Raymond

Title Mgr. Environmental Engineering

Mailing address PO Box 426, Marcus Hook, PA 19061

Area code and phone no. 215 - 447 - 1176

Name of person interviewed Richard Ware

Title Sr. Environmental Engineer

Mailing address (if different from above) same

Area code and phone no. 215 - 447 - 1178

1. Site characterization:

   a. ☒ Treatment - ☐ surface impoundments, ☒ chemical, ☒ physical, ☐ biological

   b. ☒ Storage - ☒ containers, ☒ tanks, ☐ surface impoundments, ☐ waste piles

   c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment

   d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:
   K048 - 52
   D001 - 2
   D007 - 8

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No *
   (* have a HWT license # PA AH 0112)

JAN 0 1986

ER–WM–300: 8/87

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

E.P.A
G. Kotkowski

TSD

Hazardous Waste Inspection Report
Generators – Part A

Date of inspection December 14, 1988 Time start 9:15 Am Time finish 4:15 pm

Name of inspector Brian K. Boyd

Company, installation name Sun Refining and Marketing Co. Inc.

Location Delaware Ave + Green Sts.

County Delaware Municipality Marcus Hook Boro

Identification number PAD 980550594

Name of responsible official Arthur Raymond

Title Mgr. Environmental Engineering

Mailing address P.O. Box 426 Marcus Hook, Pa 19061-0426

Area code and telephone number (215) 447-1176

Name of person interviewed Richard Ware

Title Senior Environmental Engineer

Mailing address *(if different from above)* P.O. Box 426 Marcus Hook, Pa. 19061

Area code and telephone number (215) 447-1178

1. Current waste handling method:

a.	☒ On-site	☒ treatment,	☒ storage,	☐ disposal	☐ PBR
b.	☒ On-site	☐ use,	☐ reuse,	■ recycle,	■ reclaim
c.	■ Off-site	☐ treatment,	☐ storage,	■ disposal	
d.	☐ Off-site	☐ use,	☐ reuse,	☐ recycle,	☐ reclaim

2. Amount of hazardous waste produced:

a. See → kg./mo.

b. See → kg./yr.

1988
1st Qtr – 5,292,000 lbs
2nd Qtr – 2,620,000 lbs
3rd Qtr – 2,606,000 lbs

3. Types of hazardous waste produced by Hazardous Waste Number:
K041 – D001 D008
K051 D002 F002

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ■ No

ER-WM-300: Rev. 3/88

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
Generators – Part B

1—No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Compliance

Status 1	2	3	4	REQUIREMENT	Chapter Citation 75.262
✓				Hazardous waste determination, copies available	(b)
✓				Identification number	(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters	(c)(4)
		✓		Authorization received from TSD facility for wastes shipped off-site	(d)
✓				PA manifest used for intrastate shipments	(e)(2)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
✓				Manifests filled out properly and completely	(e)(7)
✓				Manifests routed properly and within time limits (7 days)	(e)(14) or (15)
	✓			Proper U.S. DOT shipping containers or packages	(f)(1)(i)
	✓			Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
	✓			Containers of 110 gal. or less marked with required PA label none used	(f)(1)(iii)
		✓		Placards offered to transporter	(f)(2)
	✓			Wastes accumulated on-site for less than 90 days	(g)(1)(i)
	✓			Wastes stored in proper containers and properly marked and labeled No Containers being used	(g)(1)(ii)
	✓			Containers managed in accordance with 75.265(q)(1)–(9)	(g)(1)(iii)
	✓			Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
✓				Records retained at designated location for 20 years	(h)
				Quarterly reports submitted to the Department	(i)
	✓			Exception reporting procedures followed	(j)
	✓			Hazardous waste disposal plan, if required	(l)
				Spill reporting procedures followed Spill at Tank 5 not reported	(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
	✓			Special requirements followed for international shipments	(o)
✓				On the job or classroom personnel training program [75.265(f)]	(g)(1)(6)
	✓			Drum accumulation area inspected weekly as per 75.265(q)(5) No Drum Storage Area in use	(g)(1)(iii)

ER-WM-302: 8/87

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
TSD Facilities – Part A

Date of inspection December 14, 1988 Time start 9:15 Am Time finish _____

Name of inspector Brian K. Boyd

Company, installation name Sun Refining and Marketing Co. Inc.

Location Delaware Ave. & Green Sts.

County Delaware. Municipality Marcus Hook Boro

Identification number PAD 980550594

Name of responsible official Arthur Raymond

Title Mgr. Environmental Engineering

Mailing address P.O. Box 426 Marcus Hook, Pa 19061-0426

Area code and telephone number (215) 447-1176

Name of person interviewed Richard Ware

Title Senior Environmental Engineer

Mailing address *(if different from above)* P.O. Box 426 Marcus Hook, Pa 19061-0426

Area code and telephone number Marcus Hook – (215) 447-1178

1. Site characterization:

a.	■ Treatment	☐ surface impoundments	■ chemical	■ physical	☐ biological	
b.	■ Storage	■ containers	■ tanks	☐ surface impoundments	☐ waste piles	
c.	☐ Disposal	☐ land treatment	☐ landfill	☐ incineration	☐ thermal treatment	
d.	☐ Use	☐ reuse	☐ recycle	☐ reclaim		

2. Does the facility generate hazardous wastes? ■ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ■ No

ER--WM--302: Rev. 3/88

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
TSD Facilities – Part B

1—No Violation Observed 2—Not Applicable 3—Not Determined 4—Non-Compliance

Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.265
✓				Part A permit application submitted.	(a)(2), (z)(2)
✓				Identification number.	(b)
✓				Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department.	(b)(1)
		✓		Waste streams not covered by permit approved by the Department before acceptance.	(c)(1)
			✓	Chemical and physical analyses repeated as required. See Comments	(c)(1)
			✓	All waste shipments inspected and sampled.	(c)(2)
✓				Waste analysis plan on-site.	(c)(3)
✓				24 hr. surveillance at active portion.	(d)(2)(i)
✓				Artifical barrier at active portion.	(d)(2)(ii)
✓				Proper signs posted and legible at a distance of at least 25 ft.	(d)(3)
✓				Inspection schedule on-site.	(e)(2)
✓				Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction.	(e)(4)
	✓			Immediate remedial action taken where a hazard is imminent or has already occurred.	(e)(4)
✓				On the job or classroom personnel training program.	(f)
✓				Records retained for each employee at facility of training, job title, and job description.	(f)(6), (7)
✓				Ignitable or reactive wastes separated from source of ignition or reaction.	(g)(1)
✓				No smoking signs displayed where there are hazards from ignitable or reactive wastes.	(g)(1)
✓				Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements.	(g)(2)
✓				Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents.	(h)(1)
✓				Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	(h)(2)(i)
✓				Facility equipped with a device for summoning outside emerency assistance.	(h)(2)(ii)
✓				Facility equipped with fire control, spill control, and decontamination equipment.	(h)(2)(iii)
✓				Facility equipped with water at adequate volume and pressure to supply fire control equipment.	(h)(2)(iv)
✓				Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.	(h)(3)
	✓			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies.	(h)(6)
✓				Contingency plan on-site and implemented.	(i)(1)
✓				Contingency plan describes action taken by personnel in the event of an emergency.	(i)(3)

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
TSD Facilities – Part B (Continued)

1–No Violation Observed 2–Not Applicable 3–Not Determined 4–Non-Compliance

Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.265
✓				Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	(i)(5)
✓				Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i)(6)
✓				Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item.	(i)(7)
✓				Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary.	(i)(8)
✓				One employee designated as the primary emergency coordinator either on the premises or on call.	(i)(11)
✓				Facility accepting only PA manifests.	(j)
✓				Manifest properly completed and routed within time limits (24 hrs.)	(j)(2), (3)
✓				Manifest discrepancies resolved or reported within time limits.	(j)(10), (11)
✓				Written operating record maintained on the premises.	(k)
✓				Written operating record contains description and quantity of wastes and method of treatment, storage or disposal.	(k)(2)(i)
	✓			Written operating record contains location and quantity of each hazardous waste.	(k)(2)(ii)
			✓	Written operating record contains results of waste analyses and treatability tests.	(k)(2)(iii)
				Written operating record contains reports and details of all incidents. Spill from Tank #5	(k)(2)(iv)
✓				Written operating record contains records and results of all inspections.	(k)(2)(v)
✓				Written operating record contains required monitoring, testing, and analytical data.	(k)(2)(vi)
✓				Written operating record contains closure and post-closure cost estimates	(k)(2)(vii)
✓				All records retained on premises and available for inspection.	(l)
✓				Quarterly reports submitted to the Department.	(m)
	✓			Emissions, discharges, fires, explosions, and groundwater contamination reported as required.	(m)(2)
	✓			Groundwater monitoring wells located at approved sites.	(n)(2)
	✓			Adequate protection groundwater monitoring wells.	(n)(7)
	✓			Groundwater sampling and analysis plan on the premises.	(n)(8)
	✓			Groundwater quality assessment and abatement outline on the premises.	(n)(14)
✓				Closure plan on the premises and up-to-date.	(o)(2)–(9)
	✓			Post-closure plan on the premises and up-to-date.	(o)(10)–(19)
✓				Annual closure cost estimate on the premises and up-to-date.	(p)(2)–(4)
	✓			Annual post-closure cost estimate on the premises and up-to-date.	(p)(5)–(7)

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
TSD Facilities – Storage (Tanks)

1–No Violation Observed 2–Not Applicable 3–Not Determined 4–Non-Compliance

Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.265
✓				Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material.	(r)(2)
				Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r)(3)
	✓			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r)(4)
	✓			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r)(4)
✓				Continously fed tanks equipped with a means to stop the inflow.	(r)(5)
		✓		Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r)(6)
✓				Monitoring equipment data inspected once each operating day.	(r)(8)(ii)
✓				Liquid level of tanks inspected once each operating day.	(r)(8)(iii)
✓				Construction materials of tanks inspected weekly.	(r)(8)(iv)
✓				Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r)(8)(v)
	✓			All hazardous waste removed from tanks and related appurtenances at closure.	(r)(9)
				Placement of ignitable or reactive waste only with the Department's approval.	(r)(10)
	✓			Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.	(r)(11)
✓				Precautions taken for handling ignitable, reactive or incompatible waste or materials.	(r)(12), (13)
				Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r)(7)
✓				Discharge control equipment inspected once each operating day.	(r)(8)(i)
			✓	Tanks labeled to accurately identify hazardous waste contained.	Act 97 Section 403(b)(2)

Pennsylvania Department of Environmental Resources
Bureau of Waste Management

Hazardous Waste Inspection Report
TSD Facilities – Storage (Containers)

1–No Violation Observed 2–Not Applicable 3–Not Determined 4–Non-Compliance

Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.265
				Containers managed to prevent leaks and spills.	(q)(1), (4)
				Containers are compatible with waste stored.	(q)(2)
				Containers are closed during storage.	(q)(3)
				Container storage area inspected weekly for leaks, deterioration, etc.	(q)(5)
				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q)(6)
				Satisfactory procedures followed for handling incompatible wastes.	(q)(7), (8)
				Incompatible wastes separated or protected from other materials.	(q)(9)
				Containers accumlation areas have containment system capable of collecting and holding spills, leaks, and precipitation.	(q)(10)
				Containment system has impervious base free of cracks.	(q)(10)(i)
				Efficient drainage provided from base to sump or collection system.	(q)(10)(ii)
				Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater.	(q)(10)(iii)
				Run-on into containment system prevented.	(q)(11)
				Spilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.	(q)(12)
				At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.	(q)(13)
				Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤6 feet high, 8 ft x 8 ft., 5-foot surrounding aisle space).	(q)(14)(i)
				Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria (≤9 feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).	(q)(14)(ii)
				Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.	(q)(14)(ii)
				Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria)≤9 feet high).	(q)(14)(iii)
				Containers labeled to accurately identify hazardous waste contained.	Act 97 Section 403(b)(2)

There are presently no containers of hazardous waste being stored in the specified area.

ER--WM--129: 3/88

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Waste Management

Inspection Report Comments

Date of Inspection December 14, 1988 Identification Number PAD 980550594

Company/Facility/Site Name Sun Refining and Marketing Co. Inc

A large quantity generator and TSD inspection was performed at the Sun Ref. & Marketing Solid Waste Facility. Present during this inspection was Paul Panek, Carl Rohr, Brian Boyd from D.E.R. and Richard Ware of Sun. During this inspection the following was observed:

1) Tanks TK-1, 2, 3, 4, 5 in the Solid Waste facility are not properly labelled so as to identify their contents.

2) Tank #5 was overfilled which caused a spill of API sludge (K051). This spill residue remains in the tank containment area. An inspection of a Tank #5 Inspection and Status Report (performed by Sykes & Sons on 2/5/87) states that the high level alarm may not work. Mr. Don Wall stated that this tank only has a visual alarm and no audible alarm. This high level alarm should be modified/repaired to prevent future incidents. As agreed by Mr. Ware, the tank containment spillage and residues will be removed and properly disposed of by January 30, 1989. Mr. Ware also agreed to have all tanks (1-5) properly labelled by 1/30/89.

3) The present Waste Analysis Plan (WAP) as stated in Sun's Part B Permit is not consistent with procedures being used. All incoming wastes are not conforming to Waste Acceptance and Fingerprint Analyses requirements. All incoming shipments of hazardous waste should be verified through the present WAP. If the present plan is too cumbersome, it should be modified and approved by the Department.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were observed during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification may be forthcoming, confirming any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not neccessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) [signature] Date 12/14/88

Inspector (signature) Brian K Boyd Date 12/14/88

Page ____ of ____

* Note— Per conversation w/ Larry Lunsk on 12/19/88, the Dept. should not request that SUN submit MOD I's for incoming wastes.

FIGURE 7.17
Corrugated Plate Oil Separator

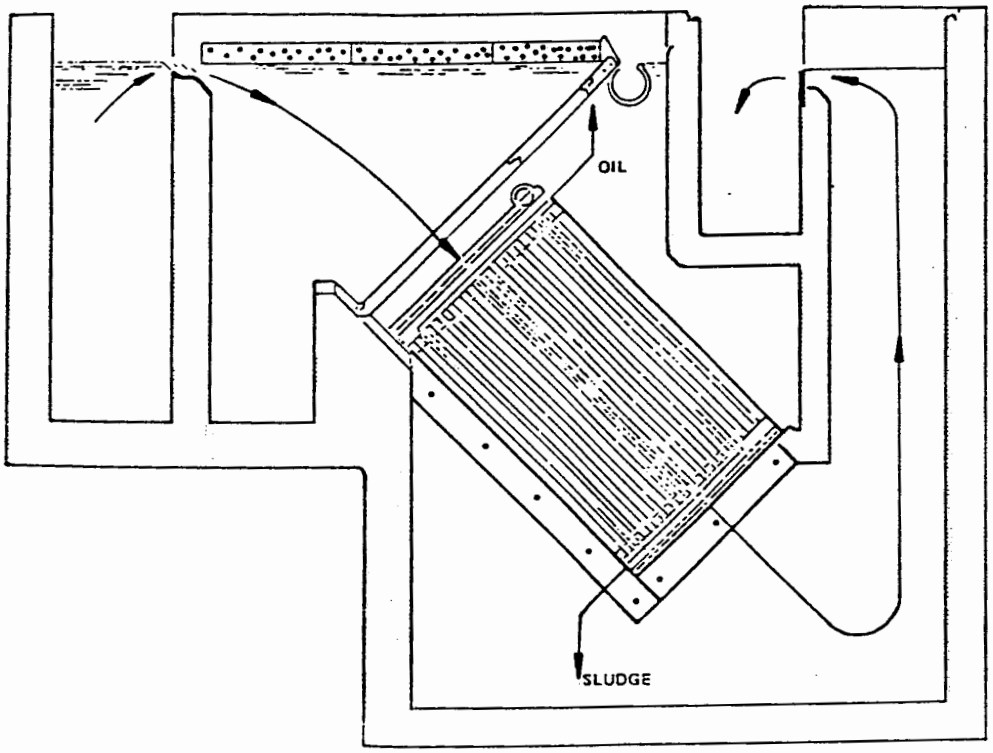
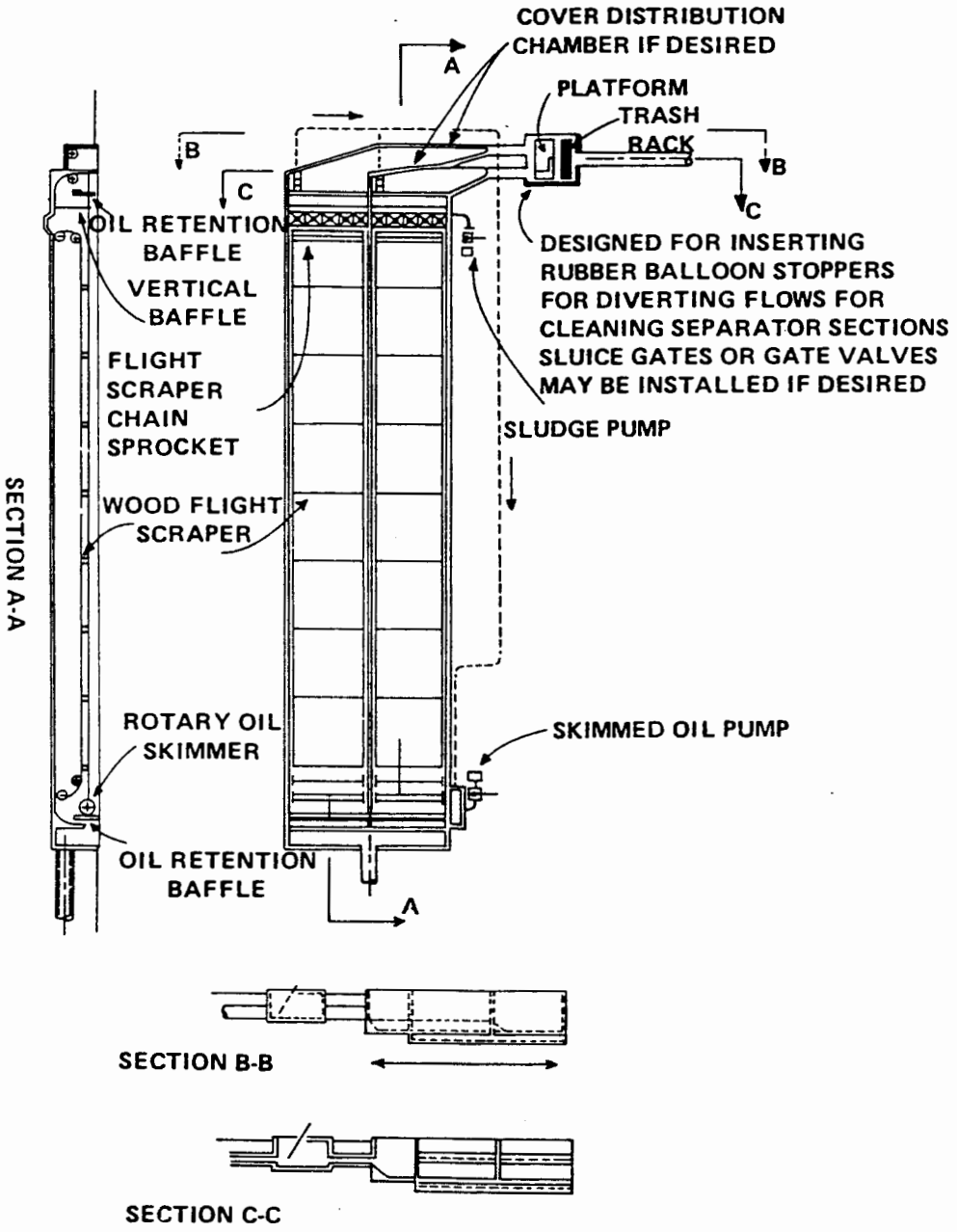


FIGURE 7.18

Example of General Arrangement for API Separator

(Courtesy of the American Petroleum Institute.)



3-29-90

SEPARATOR CLEANING SCHEDULE
SPRING/FALL 1990

SEPARATOR	PROPOSED CLEANING WEEK OF:	FREQUENCY	DATE LAST CLEANING	INCHES PRIMARY	INCHES SECONDARY	REMARKS
1-A	MAR-5-91	14 MOS	11-22-89	28"		
1-C	APR 16-90	18 MOS	10-24-88	31"		
1-D		AS NEEDED	10-9-89	48"		
						WILL SHEDULE 1-f WHEN NU PLATE PACKAGE
1-f		12 MOS	10-9			E.T.A.
10-A	JUNE 11-90	6 MOS	12-21-89	33"		REMOVE COVERS, INCLUDING INLET COVERS
10-B	JUNE 15-90	"	"	36"		
12-A	JUNE 26	6 MOS	12-16-89	FIRST CLNING		INCLUDE CLEANING EFLUENT FLUME & INLET GOX
12-B	JUNE 27	6 MOS	12-16-89	FOLLOWING INSTALATION OF NU PLATE PACKS		
15-A		6 MOS	11-16-89	37"		
15-B		6 MOS	11-14-89	28"		
15-C	APR 23-90		10-16-90	25"		
15-D	APR 30-90		10-18-90	28"		INLET VALVES LKING THRU
15-E	~~MAY~~ 3-90		10-26-90	22"		INLET VALVES LKING THRU
15-F	4-10, 5-8, 6-5, 7-9, 7-7	25 DAYS	~~8-29~~-90	48"		
15-G	MAY 16-90	6 MOS	11-4-90	23"		INLET VALVES LKING THRU
15-H	MAY 10-90	6 MOS	11-6-90	33"		
16-A	JUNE ~~MAY~~ 5-90	6 MOS	11-28-90	17"		REMOVE INLET COVERS CLEAN
16-B	MAY 29-90	6 MOS	11-24-90	23"		SUCTION SUMPS (2) ALL 3 POCKETS
16-C	MAY 22-90	6 MOS	11-20-90	15"		
V-29		AS NEEDED				
132ch	9-5-90	12 MOS	5-7-89	6'-7'		EXCESSIVE LOADING DUE TO 10-4 SLURRY DUMPING
W-12	10-8-90	?	1983			CONTINGENT UPON RESULTS OF INFRARED SURVEY

ER—WM—58: Rev. 3/88

Date Prepared

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

I.D. Number 364

(For Department Use Or

FORM C
COMPLIANCE HISTORY
(Formerly "Module #10")

Fully and accurately provide the following information, as specified.
Attach additional sheets as necessary.

☐ Original Filing ☒ Amended Filing Date of Last Filing September 17, 1988

A. General Applicant Information:

1. NAME OF PERMIT OR LICENSE APPLICANT/PERMITTEE/LICENSEE:

Sun Refining and Marketing Company

ADDRESS: Marcus Hook Refinery
Delaware Avenue & Green Street
Marcus Hook, PA 19061

TELEPHONE NUMBER: (215) 447-1000

SOCIAL SECURITY OR TAXPAYER ID#: 23-1743283

2. Identify the form of management under which the applicant conducts its business in Pennsylvar (check appropriate box):

- ☐ Individual
- ☐ Municipality
- ☐ Proprietorship
- ☒ Public Corporation
- ☐ Private Corporation
- ☐ Syndicate
- ☐ Municipal Authority
- ☐ Partnership
- ☐ Limited Partnership
- ☐ Government Agency
- ☐ Joint Venture
- ☐ Association
- ☐ Other _____ (specify the nature of the business relationship)

B. General Information Regarding "Related Parties"

1. Provide the names, addresses and telephone numbers of person or parties related to the applic (reference the "Instructions for Form C", Items 4 and 5). The relationship to the applicant sh be clearly described (a diagram of corporate structure would be helpful, and may be provide

N/A

2. Provide the names and addresses of all owners of record of surface and subsurface areas with and contiguous to the proposed permit area.

N/A

3. Provide the names and addresses of all holders of record to a leasehold interest of surface and s surface areas within, and contiguous to the proposed permit area.

N/A

4. For applicants other than sole proprietorships, the following information shall be provided:

(a) Names, addresses and social security numbers of all principals, corporate officers, general and limited partners, directors and other persons performing a function similar to a director of the applicant.

See Attached List

(b) For corporations, the principal shareholders or stockholders who own, hold, or control stock of five percent (5%) or more of a publicly held corporation or ten percent (10%) or more of a privately held corporation.

N/A

(c) For corporations, state the names, principal places of business and taxpayer ID numbers of all domestic and foreign parent corporations (including ultimate parent corporations), and all domestic and foreign subsidiary corporations of the applicant, as well as the subsidiary corporations of the ultimate parent corporation. Include unincorporated divisions and private corporations.

Sun Company, Inc., Radnor, PA is the parent corporation of Sun Refining and Marketing Company. The Sun Company Tax ID No. is: 23-1743282.

(d) Names, addresses and social security numbers*, or IRS tax identification numbers and affiliation of other persons or related parties having or exercising control over any aspect of the proposed facility or activity that is regulated by the Department, including but not limited to, associates, and agents, contractors, subcontractors, and property owners.

None

(e) List all principals that have also been principals of other corporations which have committed violation of the Environmental Protection Acts. (see "Instructions" attached.)

None

5. If the applicant, or an officer, principal shareholder, general or limited partner, or other related party to the applicant, has as a beneficial interest in, or otherwise manages or controls any other person, municipality or other related party (as described in Sections A and B herein) engaged in the business of solid waste collection, transportation, storage, processing, treatment, or disposal, the following information shall be provided:

None

(a) The name, address, and tax identification number or employer identification number of the corporation or other person or municipality, or other entity.

(b) The nature of the relationship or participation with the corporation or other person or municipality, or other related party.

*Supplying individual social security numbers is optional; failure to provide all applicable numbers may make processing of the application more time-consuming.

FORM C

C. **Specific Information Regarding the Applicant and Its Related Parties**

1. Identify all of the **applicant's places of business and terminals** where:
(a) municipal or residual waste processing or disposal facilities or activities are conducted in Pennsylvania.
(b) hazardous waste generation (with the exception of small quantity generation), transportation, storage, treatment or disposal facilities or activities are conducted in Pennsylvania.

Please See Attached List

2. List all **permits or licenses issued** by the Department under the Environmental Protection Acts to the applicant or any other persons or related parties identifed in Sections A or B, that are currently in effect or have been in effect at any time in the ten years previous to the date on which this form is completed. This list is to include the type of permit or license, number, location, issuance date and expiration date.

Please See Attached List

3. List all **permit or licenses denials** issued by the Department under the Environmental Protection Acts to the applicant or any other person or related party identified in Section A or B, within ten years previous to the date on which this form is completed. This list is to include the type of permit or license, number, location, denial date and reason for denial.

None

4. List all persons or related parties identified in Sections A or B which have filed or been discharged from **bankruptcy** within 10 years previous to the date on which this form is completed for which the debtor sought to abandon property or to be discharged from liability for any environmental liability subject to the Environmental Protection Acts. This list to include the name of the bankruptcy court, docket number and description and location of property involved.

N/A

FORM C

D. **Compliance Background:**
(Note: Copies of specific documents shall be made available to the Department upon its request)

1. **Compliance History Inside Pennsylvania:**

a. Describe any "**Notice of Violation**" sent by the Department to the applicant or those persons or related parties identified anywhere in response to Sections A or B.

Date	***Location***	***Permit/ License/ EPA ID#***	***Nature of Violation***	***Disposition***

See Attached List

b. Describe any **administrative orders** issued by the Department, **civil penalties assessed** by the Department, **permit or license suspensions/revocations, bond forfeiture actions** brought by the Department, and **civil penalties** actions adjudicated by the Environmental Hearing Board against the applicant or those persons or related parties identified anywhere in **Sections** A or B concerning the Environmental Protection Acts, or of a regulation or order of the Department, or of a condition of a permit or license. Provide the date, location and nature of the violations. In lieu of description, the applicant may provide a copy of the orders, assessments and actions.

See Attached List

c. Describe any **summary, misdemeanor,** or **felony convictions,** or **pleas of guilty or no contest** that have been obtained in Pennsylvania against the applicant or those persons or related parties identified anywhere in Sections A or B pursuant to the Environmental Protection Acts or for any acts in Pennsylvania involving the storage, treatment, transportation, processing or disposal of municipal, residual or hazardous wastes. The description shall include the date location, nature and disposition of the actions.

None

d. Describe any **Pennsylvania court proceedings** in which those persons or related parties ide tified anywhere in Sections A or B have been involved in relation to the Environmental Prote tion Acts.

N/A

e. Describe any **consent order, consent adjudication, consent decree or monetary settlement** (se tlement agreement, letter agreement, settlement letter or consent assessment) between th applicant or those persons or related parties identified anywhere in Sections A or B and th Department, US EPA, or a county health department, regarding the Environmental Protectio Acts, or any other environmental statute, regulations or ordinance concerning any municipa residual or hazardous waste facility or activity in Pennsylvania. The description shall includ the date, location, nature and disposition of the action. In lieu of a description, the applica may provide a copy of the order, adjudication, decree or agreement.

None

f. For all facilities and activities identified in Sectio.n C, indicate all violations committed and subs quent enforcement actions (with the exception of Notices of Violation) taken regarding th facility or activity. Include the date of the action, the location, the nature, and disposition the violation. In lieu of a description, the applicant may provide a copy of the appropriate doc ment. State the reasons that the Department suspended, revoked, or denied a permit/perm application or license/license application filed by the applicant or any related party, identifie in Sections A or B.
Note: Violations and enforcement actions are described in the "Instructions for Form C", Item

See Attached Listing

2. **Compliance History Outside Pennsylvania:**

Describe any violations (as described by Item 6 of the "Instructions for Form C") of the Environmen Protection Acts committed by the applicant or any person or related party identified in Sectio A or B occurring outside the Commonwealth. Provide the dates of the action, and the date, lo tion, and nature of the underlying violation. Dates of convictions or pleas shall also be provid In lieu of a description, the applicant may provide a copy of the appropriate document. For licen or permit revocations/suspensions/denials, the reasons for the action shall be specifically stat

Date	Location	Description	Penalty	
7/26/88	Claymont, DE	Oil Spill from Drain Backed Up	$1,000	*See Below

[Note: For corporate applicants which are publicly traded, are diversified and have done busin in Pennsylvania long enough to provide an in-state basis for evaluating compliance history, It D.2 may be answered through the submission of SEC 10K reports for the past five years, a curr proxy statement, and any corporate statements or directives which articulate the corporation's po with regard to compliance with environmental laws in general or solid waste management la in particular. Any applicant who wishes to make such submission in response to Item D.2 sho ask for further instructions from the Department office to which the permit or license applica is being submitted.]

Date	Location	Description	Penalty
1/25/88	Claymont, DE	Loss of Power/Sump Overflow	$ 250

FORM C

I (we) hereby certify that I (we) have the authority to respond to the above questions on behalf of the applicant, and that the information provided herein is true and correct to the best of my (our) knowledge, information and belief.

H S Roe, Jr.
(Signature)

Name: H. S. Roe, Jr.
(Print or Type Name)

Title: Vice President, Operations
(Print or Type Title)

Social Security No.: 144-36-8236

Sworn to and subscribed before me this 17th day of August, 19 90.

Linda J. Whittington
Notary Public

NOTARIAL SEAL
LINDA J. WHITTINGTON, Notary Public
Marcus Hook, Delaware Co.
My Commission Expires [illegible]

Carol L. Guard
(Signature)

Name: Carol L. Guard
(Print or Type Name)

Title: Corporate Secretary
(Print or Type Title)

Social Security No.: 165-40-4152

Sworn to and subscribed before me this 17th day of August, 19 90.

Linda J. Whittington
Notary Public

NOTARIAL SEAL
LINDA J. WHITTINGTON, Notary Public
Marcus Hook, Delaware Co.
My Commission Expires [illegible]

Affix Corporate Seal:

(For Corporations, see the Instructions, Item 9, regarding corporate seal and signatures.)

DECEMBER 21, 1989 UNIT: SUN REFINING & MKTG
COMPANY: 00666 SUN REFINING AND MARKETING COMPANY
(FORMERLY SUN OIL COMPANY OF PENNSYLVANIA - NAME CHANGED ON OCTOBER 28, 1981)

DIRECTORS AND OFFICERS:

R.H. CAMPBELL (ROBERT)	DIRECTOR
~~J.V.D. FEAR~~	~~DIRECTOR~~ resigned 7/31/90
D.E. KNOLL (DAVID)	DIRECTOR
R. MCCLEMENTS, JR. (ROBERT)	DIRECTOR
H.S. ROE, JR. (HARWOOD)	DIRECTOR
* P.F. WAITNEIGHT (PETER)	DIRECTOR

R.H. CAMPBELL (ROBERT)	CHAIRMAN OF THE BOARD
D.E. KNOLL (DAVID)	PRESIDENT
H. ALONSO (HERIBERTO)	VICE PRESIDENT
P.E. COGGINS, JR. (PATRICK)	VICE PRESIDENT
J.L. FOLTZ (JACK)	VICE PRESIDENT
K.D. HILL (KENNETH)	VICE PRESIDENT
J.D. MAZZEI (JOSEPH)	VICE PRESIDENT
E.J. MEYER (EDWARD)	VICE PRESIDENT
N.J. NEUHAUSEL (NICHOLAS)	VICE PRESIDENT
E.V. OSBORNE (EDWARD)	VICE PRESIDENT
H.H. PAGE, JR. (HENRY)	VICE PRESIDENT
T.D. PATRICK (DANIEL)	VICE PRESIDENT
D.C. RIPPY (DAVID)	VICE PRESIDENT
H.S. ROE, JR. (HARWOOD)	VICE PRESIDENT
J.J. SHANNON (JAMES)	VICE PRESIDENT

DECEMBER 21, 1989 UNIT: SUN REFINING & MKTG
COMPANY: 00666 SUN REFINING AND MARKETING COMPANY
(FORMERLY SUN OIL COMPANY OF PENNSYLVANIA - NAME CHANGED ON OCTOBER 28, 1981)

DIRECTORS AND OFFICERS:

W.S. SMITH, JR. (WILLIAM)	VICE PRESIDENT
S.L. THOMPSON (SHELDON)	VICE PRESIDENT
P.F. WAITNEIGHT (PETER)	VICE PRESIDENT
D.M. ZEBLEY (DAVID)	VICE PRESIDENT
C.L. GUARD (CAROL)	SECRETARY
T. BROWNLIE, JR. (THOMAS)	ASSISTANT SECRETARY
G.R. HUTCHINSON (RANDALL)	ASSISTANT SECRETARY
J.J. MCKEEVER (JOHN)	ASSISTANT SECRETARY
C.G. SCHANZ (CHARLES)	ASSISTANT SECRETARY
R.L. CARTLIDGE (RICHARD)	CONTROLLER
R.H. MEREDITH (ROBERT)	ASSISTANT CONTROLLER
R.L. CARTLIDGE (RICHARD)	TREASURER
G.R. HUTCHINSON (RANDALL)	ASSISTANT TREASURER
J.J. MCKEEVER (JOHN)	ASSISTANT TREASURER
W.B. PRIESTLEY (WILLIAM)	ASSISTANT TREASURER
B.H. ROSENBERG (BARRY)	ASSISTANT TREASURER
J.A. RUDDY, JR. (JOHN)	ASSISTANT TREASURER

QUESTION C.1: APPLICANT'S PLACE OF BUSINESS

Sun Refining and Marketing Company
Marcus Hook Refinery
Delaware Avenue & Green Street
Marcus Hook, Penna. 19061
PAD 980 550 594

Sun Refining and Marketing Company
Read-Boyd Farm
Route 452
Linwood, Upper Chichester, Penna. 19061
PAD 000 647 438

Sun Refining and Marketing Company
#2 Tank Farm
Routes 322 and 452
Twin Oaks, Aston, Penna. 19014
PAD 000 647 446

Sun Refining and Marketing Company
#3 Tank Farm
Naamans Creek Road
Bethel Township, Penna. 19061
PAT 000 647 453

REW:rwg
8/7/90
EE1020

QUESTION C.2: PaDER PERMITS/LICENSES

I. AIR

SOURCE	PERMIT NO.	EXPIRATION	NOTES
CO Boiler #2	23-302-044	6/30/93	Out of Service
Plt.8-C Proc.Htr.	23-302-044	6 30/93	
Plt.15-5 Pr.Htr.(3)	23-302-044	6/30/93	Prev.23-312-032
Plt.15-1 Proc.Htr.	23-302-075	6/30/93	Prev.23-302-075
Plt.12-3 Vac.Htr.	23-302-120	6/30/93	Prev.23-302-120
Plt.12-3 Proc.Htr.	23-312-170	6/30/93	
CPI Separator	23-312-029	11/12/81	Inactive
Underground Cav.	23-312-042	11/12/78	Inactive
St.Tank #101	23-312-044C	5/31/93	
St.Tank #230	23-312-044C	5/31/93	Prev.23-312-133
St.Tank #237	23-312-044C	5/31/93	Prev.23-312-134
St.Tank #242	23-312-044C	5/31/93	
St.Tank #246	23-312-044C	5/31/93	
St.Tank #248	23-312-044C	5/31/93	
St.Tank #249	23-312-044C	5/31/93	
St.Tank #250	23-312-044C	5/31/93	
St.Tank #252	23-312-044C	5/31/93	
St.Tank #255	23-312-044C	5/31/93	Prev.23-312-044A
St.Tank #320	23-312-044C	5/31/93	Prev.23-312-168
St.Tank #344	23-312-044C	5/31/93	Prev.23-312-047
St.Tank #347	23-312-044C	5/31/93	Prev.23-312-140
St.Tank #348	23-312-044C	5/31/93	Prev.23-312-141
St.Tank #349	23-312-044C	5/31/93	Prev.23-312-142
St.Tank #353	23-312-044C	5/31/93	Prev.23-312-046
St.Tank #354	23-312-044C	5/31/93	Prev.23-312-143
St.Tank #355	23-312-044C	5/31/93	Prev.23-312-144
St.Tank #357	23-312-044C	5/31/93	Prev.23-312-044B
St.Tank #358	23-312-044C	5/31/93	Prev.23-312-044B
St.Tank #383	23-312-044C	5/31/93	Prev.23-312-135
St.Tank #385	23-312-044C	5/31/93	Prev.23-312-136
St.Tank #387	23-312-044C	5/31/93	Prev.23-312-137
St.Tank #389	23-312-044C	5/31/93	Prev.23-312-138
St.Tank #390	23-312-044C	5/31/93	Prev.23-312-139
St.Tank #443	23-312-044C	5/31/93	
St.Tank #452	23-312-044C	5/31/93	
St.Tank #467	23-312-044C	5/31/93	
St.Tank #524	23-312-044C	5/31/93	
St.Tank #491	23-312-044C	5/31/93	
St.Tank #593	23-312-044C	5/31/93	Prev.23-312-055
St.Tank #598	23-312-044C	5/31/93	
St.Tank #599	23-312-044C	5/31/93	
St.Tank #610	23-312-044C	5/31/93	
St.Tank #611	23-312-044C	5/31/93	
St.Tank #F23	23-312-044C	5/31/93	Prev.23-312-158
Ground Flare	23-312-045	Temporary	Reapply ea. use
CPI Separator	23-312-050	11/12/81	Inactive
Fume Incinerator	23-312-051	1/9/78	Inactive

QUESTION C.2 PaDER PERMITS/LICENSES

I. AIR (CONT.)

SOURCE	PERMIT NO.	EXPIRATION	NOTES
API Sep.#9 ABC	23-312-052	5/31/93	Out of Service
API Sep.#10 AB	23-312-052	5/31/93	Prev.23-312-145
API Sep.#15 AB	23-312-052	5/31/93	Prev.23-312-146
API Sep.#16 ABC	23-312-052	5/31/93	Prev.23-312-147
BTX Trk.Unloading	23-312-053	9/30/91	
St.Tank #316	23-312-071	8/31/93	Prev.23-312-071
St.Tank #317	23-312-071	8/31/93	Prev.23-312-072
St.Tank #323	23-312-071	8/31/93	Prev.23-312-108
St.Tank #324	23-312-071	8/31/93	Prev.23-312-109
St.Tank #327	23-312-071	8/31/93	Prev.23-312-110
St.Tank #328	23-312-071	8/31/93	Prev.23-312-111
St.Tank #329	23-312-071	8/31/93	Prev.23-312-112
St.Tank #331	23-312-071	8/31/93	Prev.23-312-113
St.Tank #333	23-312-071	8/31/93	Prev.23-312-114
St.Tank #321	23-312-071	8/31/93	Prev.23-312-127
St.Tank #1	23-312-088	8/26/81	Inactive
St.Tank #2	23-312-089	8/26/81	Inactive
St.Tank #3	23-312-090	8/26/81	Inactive
St.Tank #4	23-312-091	8/26/81	Inactive
St.Tank #332	23-312-096	8/26/81	Inactive
Banking-Tk.#312 313,317,325 & 326	23-312-149	8/31/86	Inactive
Gasoline Loading	23-312-169	6/30/94	
Banked Emissions	23-325-003		Expired
Cogeneration Unit	23-399-018	3/31/91	
Opacity CEM,FCCU	CEMS 1582		

II. WATER

DESCRIPTION	NUMBER	EXPIRATION
Water Quality Mgmt.		
-Upper #1 Tk.Farm	2375203	Issued 11/76
-Refinery	2379202	Issued 6/81
-#2 Tk.Farm	2379203	Issued 1/81
Sanitary Wastewater	1172	N/A
Sanitary Wastewater	870	N/A
Sanitary Wastewater	512	N/A
NPDES	PA0011096 (Renewed 6/25/86)	6/25/91

QUESTION D.1.a.b.f.: INCIDENT SUMMARY

I. AIR

	DESCRIPTION	FINE
1/6/75	Particulate Emissions	2,000
2/10/75	Particulate Emissions	2,000
3/13/75	Particulate Emissions	2,000
4/15/75	Particulate Emissions	2,000
7/76	Particulate Emissions	2,000
8/76	Particulate Emissions	2,000
10/76	Benzene Loading	40
8/78	Particulate Emissions	2,000
7/20/78	Particulate Emissions	16,000
9/27/78	Particulate Emissions	14,000
10/27/78	Particulate Emissions	4,000
11/13/78	Particulate Emissions	2,000
8/22/80	Particulate Emissions	28,000
1/8/79	Particulate Emissions	2,000
2/9/79	Particulate Emissions	2,000
4/9/79	Particulate Emissions	6,000
4/20/79	Particulate Emissions	3,000
5/18/79	Particulate Emissions	3,000
2/20-3/1/79	Particulate Emissions	1,110
7/3/79	Particulate Emissions	3,000
7/17/79	Particulate Emissions	3,000
10/31-11/6/81	Particulate Emissions	2,100
7/8/83	Sulfur Dioxide Emissions	23,630
3/6/86	Opacity Noncompliance	1,000
9/30/85	Opacity Noncompliance	3,000
4/22/86	Opacity Noncompliance	2,000
10/10/86	Opacity Noncompliance	500
12/23/86	Opacity Noncompliance	3,000
12/31/86	Opacity Noncompliance	3,357
2/13/87	Benzene VOC Noncompliance	18,000
1/28/87	Opacity Noncompliance	1,000
1/29/87	Opacity Noncompliance	1,000
4/1/87	Opacity Noncompliance	423
5/18/87	Sulfur Dioxide Emissions	10,250
2/19/88	Sulfur Dioxide Emissions	17,271
3/14/88	Smoking Flares	2,500
5/16/88	Sulfur Dioxide Emissions	18,467
6/28/88	Sulfur Dioxide Emissions	6,070
7/20/88	Sulfur Dioxide Emissions	9,800
7/25/88	Sulfur Dioxide Emissions	644
8/4/88	Sulfur Dioxide Emissions	3,430
8/29/88	Acid Vapors	1,485
10/21/88	Sulfur Dioxide Emissions	41

QUESTION D.1.a.b.f.: INCIDENT SUMMARY (CONT.)

I. AIR (CONT.)

DATE	DESCRIPTION	FINE
10/26/88	Sulfur Dioxide Emissions	1,500
11/22/88	Vent Not Properly Controlled	40,000
1/12/89	Sulfur Dioxide Emissions	1,515
1/23/89	Sewer Vapors	2,000
1/23/89	Sulfur Dioxide Emissions	2,400
4/10/89	Sulfur Dioxide Emissions	1,577
5/8/89	Particulate Emissions	3,000
7/3/89	Sulfur Dioxide Emissions	3
8/20/89	Particulate Emissions	10,000
10/17/89	Sulfur Dioxide Emissions	608

II. WATER

DATE	DESCRIPTION	FINE
8/7/74	Ocean Dumping	1,750
7/30/76	Benzene Truck Loading	2,000
9/13/76	Benzene Truck Loading	270
11/22/78	Spill to Middle Creek	100
5/2/79	Fish Kill (Read-Boyd Farm)	300
3/2/80	Acidic Discharge (DELCORA)	2,500
11/24/80	NPDES Fine per Consent Order	1,000
12/1/80	Original Consent Order	85,700
1981	NPDES Noncompliances	6,800
1982	NPDES Noncompliances	6,400
1983	NPDES Noncompliances	6,700
1984	NPDES Noncompliances	3,400
1985	NPDES Noncompliances	2,300
1986	NPDES Noncompliances	405,000
1987	NPDES Noncompliances	22,800
1988	NPDES Noncompliances	59,000
1/25/88	Loss of Power-Sump Overflow to River	250
4/24/88	Dock Drain Fan Overflowed	250
8/3/88	Line Spill at Dock	200
11/4/88	Spill to Middle Creek	750

QUESTION D.1.a.b.f.: INCIDENT SUMMARY

III. ASBESTOS

DATE	DESCRIPTION	FINE
1/14/80	Plant 15-2A	700
9/26/80	Plant 15	500
10/31/80	Plant 17	700

REW:rwg:8/7/90
EE1020-I

ER BWQ-3: REV. 4-77
NOTE: SEE COPY 2 BEFORE SIGNING

PA various dates

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

DATE 2/9/88 (152)

TIME 10:45

ESTABLISHMENT	CASE	LOCATION (STREET/STATE ROUTE)	COUNTY	MUNICIPALITY	PROGRAM
Sun Refining and Marketing Inc - Marcus Hook Refinery		Delaware Ave & Green St.	Delaware	Marcus Hook Boro	IW

OPERATOR NAME	VALID CERTIFICATE POSTED	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREADY MINED
Ted Grabowski	YES ☐ NO ☐	215-447-1000			

RESPONSIBLE OFFICIAL	ADDRESS	TELEPHONE NO.
Sun Refining & Marketing Inc	1801 Market Street	

PERSON INTERVIEWED	ADDRESS	TELEPHONE NO.	INDUSTRIAL PRODUCTS
Lee Tilton - PAFC Ted Grabowski	Philadelphia, PA 19103		1. petroleum products 2.

TREATMENT PROCESS | **NUMBER OF UNITS** (TOT, IN OP) | **REMARKS**

Follow-up site investigation to spill of Benzene which occurred approximately 01:10 this morning during the filling of a barge. (MasterCraft Coach Inc - Michael Davis 302-999-7257) Approximately 350 barrels (uncontained) was spilled due to barge overfill. Responsibility for the incident is currently under investigation by Sun.

South Jersey (609-423-1454) arrived on site to begin containment and clean up around 02:30. Booms were deployed at this time and were closed approximately three hours later. Some booms have already been removed with Coast Guard approval. Benzene remains on the river bank in the vicinity of Dock 3b. This will be picked up and reprocessed. Material must be cleaned from banks.

The barge remains surrounded by containment booms. It will be washed, then benzene will be cleaned from within the containment area. Some small areas of sheen were noted on the river beyond the containment.

A few fish were noted swimming in the area, none of which were in distress at this time. All contaminated material not be reprocessed must be disposed of properly.

VIOLATIONS

1. unpermitted discharge industrial waste to Waters of the Commonwealth

LAWS, REGULATIONS OR PERMIT NO. & COND.

PA Clean Streams Law

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)
None collected									

RECEIVING STREAM APPEARANCE

NAME	ABOVE DIS APP	BELOW DIS APP
Delaware	ok	slight sheen

IDENTIFICATION

	C	CO	MUN	T	EST	CASE	FAC NO. 1	FAC NO. 2	FAC NO. 3	FAC NO. 4	DATE OF INSPECTION	INSPECTING AGENCY
1												
2		4-5	6-8	9	10-11	12-13	14-16	14-16	14-16	14-16	17-22	23-25
3	X										020988	701

SS 3

	FACILITY NAME	DIS. VOL. (MGD) 49-52	COMPLIANCE FED 66	INT 67	FAC 68	OP 69	PERMIT COMP 70	OPER STAT 71-72
1	Settlement Letter - Master Craft Coach Inc							
2								
3								
4								

PERSON INTERVIEWED (SIGNATURE) [signature]

TITLE AND DATE Envt. Engineer 2/9/88

INVESTIGATOR (SIGNATURE) Marcella L. Stoltz

TITLE AND DATE WQS 2/9/88

(USE BLACK INK ONLY) CENTRAL OFFICE

COMMONWEALTH OF PENNSYLVANIA
OA-502 REV. 70-12

DESK MEMORANDUM

SUBJECT: File: Marcus Hook Boro
Delaware Co.

Sun Marketing + Refining - Benzene Spill

TO	FROM
Files	M. Stoltz
DATE SENT: 3/15/88	DATE NEEDED

	PLEASE CALL:		APPROVAL		SEE ME
	RETURNED YOUR CALL		AS REQUESTED		COMMENT
	INFORMATION		PREPARE REPLY/REPORT		NOTE AND FILE

RECEIVED BY	DATE	TIME

ROUTE	INITIAL	DATE	ROUTE	INITIAL	DATE

MESSAGE

Spoke to Ted Grabowski regarding results of Sun's investigation into benzene spill which occurred 2/9/88.

Ship responsible for telling Sun when to stop pumping. Standard Operating Procedure: 1 hr prior to fill ship notifies Sun so they can line up people for lab testing prior to ship departure. ~15 min prior to fill ship notifies Sun to have someone stand by shut off valve. Notification was never received. Hose watcher standing by at shed. Someone noticed smell of benzene. Hose watcher shut off valve. 361 barrels (42 gallons/barrel) spilled to Delaware.

Automatic shutoff on barge inoperable. No nitrogen canisters.

Sun initiated clean-up. Have verbal agreement Mastercraft Inc. to pay for clean-up.

Report to be issued to DEP/EPA delayed by PFC action.

ER BWQ-32 REV. 4-77
NOTE: SEE COPY 2 BEFORE SIGNING

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

DATE 5-7-87
TIME 1330

ESTABLISHMENT	CASE	LOCATION (STREET/STATE ROUTE)	COUNTY	MUNICIPALITY	PROGRAM
Sun Oil Co.	Sun Transport Fac.		Delaware	Marcus Hook	S.W.

OPERATOR NAME	VALID CERTIFICATE POSTED YES ☐ NO ☐	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREAD MINED
		447-1000			
RESPONSIBLE OFFICIAL Tom Crawford, Envr. Coord	ADDRESS Box 426 Marcus Hook, Pa. 19061	TELEPHONE NO.	INDUSTRIAL PRODUCTS		
PERSON INTERVIEWED Ted Grabowski, Envr. Eng.	ADDRESS	TELEPHONE NO.	1.	2.	

TREATMENT PROCESS

NUMBER OF UNITS TOT	NUMBER OF UNITS IN OP

REMARKS

Inspection of the Sun Transport Dock revealed residual oil puddles near manifolds, resulting from an unpermitted discharge of oil to the Delaware Rv. on Monday. The oil on the dock is thought to possibly be from a leaking manifold or truck delivering. The operator plans to remove all contaminated materials and dispose of them at Fairless Landfill. Some sheen observed around bilge area. No immediate plans for well monitoring in area. Clean fill will be put in to replace old material.

VIOLATIONS

1) Unpermitted Discharge of oil to Del. Rv.
2) Failure to notify.

LAWS, REGULATIONS OR PERMIT NO. & COND

1) Clean Streams Law
3) Chapter 91

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)

RECEIVING STREAM APPEARANCE

NAME	ABOVE DIS APP	BELOW DIS APP
Delaware		

IDENTIFICATION

		CO	MUN	T	EST	CASE	FAC NO. 1	FAC NO. 2	FAC NO. 3	FAC NO. 4	DATE OF INSPECTION	INSPECTING AGENCY
		4-5	6-8	9	10-11	12-13	14-16	14-16	14-16	14-16	17-22	23-25
1	C										05 07 87	101
2	A											
3	X											

PERSON INTERVIEWED (SIGNATURE) 5/7/87
TITLE AND DATE Sr. Envt. Eng.
INVESTIGATOR (SIGNATURE) Ruth Plant
TITLE AND DATE WQS 5-7-87

FACILITY NAME	DIS. VOL. (MGD)	COMPLIANCE FED	COMPLIANCE INT	COMPLIANCE FAC	COMPLIANCE OP	PERMIT COMP	OPER STAT
	49-52	66	67	68	69	70	71-72
1							
2							
3							
4							

ER BWQ-32 REV. 4-77
NOTE: SEE COPY 2 BEFORE SIGNING

RA

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

DATE 4/27/87
TIME 1030

ESTABLISHMENT	CASE	LOCATION (STREET/STATE ROUTE)	COUNTY	MUNICIPALITY	PROGRAM
Sun O.I Co.	Dock # 1+2	Refinery	Delaware	Marcus Hook	I.W.

OPERATOR NAME	VALID CERTIFICATE POSTED	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREAD MINED
	YES ☐ NO ☐	447-1000			

RESPONSIBLE OFFICIAL	ADDRESS	TELEPHONE NO.	INDUSTRIAL PRODUCTS
Joseph D. Mazzei, Ref Mgr.	Box 426 Marcus Hook, Pa. 19061	447-1176	

PERSON INTERVIEWED	ADDRESS	TELEPHONE NO.	1.	2.
Ted Grabowski - Envir.				

TREATMENT PROCESS	NUMBER TOT	NUMBER OP	REMARKS (NOT)	VIOLATIONS
			Pressure test of lines found no leaks. Sample analysis indicate the possibility of the Kerosene Transfer lines leaking, excavation of this section is on-going. All pits except one have been refilled with clean fill. Investigation of #1 Dock revealed no oil sheens or leaks on river. Operator indicated sheen observed on Friday was due to possibly rain washing residuals off of residuals from pump maintenance activities earlier that week being washed off. Maintenance crews found no sources to #1 Dock sheens. Coast Guard Teams will monitor progress of clean-up. South Jersey pumping P.T. Snow Environmental contracted for Solid Waste disposal	LAWS, REGULATIONS OR PERMIT NO. & CONI

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)

RECEIVING STREAM APPEARANCE

NAME	ABOVE DIS APP	BELOW DIS AP
Delaware Rv.		

IDENTIFICATION

	C	CO (4-5)	MUN (6-8)	T (9)	EST (10-11)	CASE (12-13)	FAC NO. 1 (14-16)	FAC NO. 2 (14-16)	FAC NO. 3 (14-16)	FAC NO. 4 (14-16)	DATE OF INSPECTION (17-22)	INSPECTING AGENCY (23-25)
1	C											
2	A										040787	701
3	X											

FACILITY NAME	DIS. VOL. (MGD) (49-52)	COMPLIANCE FED (66)	COMPLIANCE INT (67)	COMPLIANCE FAC (68)	COMPLIANCE OP (69)	PERMIT COMP (70)	OPER STAT (71-72)
1							
2							
3							
4							

PERSON INTERVIEWED (SIGNATURE) MD 5-4-87
TITLE AND DATE 4/27/87
INVESTIGATOR (SIGNATURE)
TITLE AND DATE WQS 4/27/87

TE: SEE COPY 2
ORE SIGNING

DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

p. 2 of 2

TIME 1100

TABLISHMENT	CASE	LOCATION (STREET/STATE ROUTE)	COUNTY	MUNICIPALITY	PROGRAM
ern Oil Co.					

ERATOR NAME	VALID CERTIFICATE POSTED YES ☐ NO ☐	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREADY MINED
SPONSIBLE OFFICIAL	ADDRESS	TELEPHONE NO.	INDUSTRIAL PRODUCTS		
RSON INTERVIEWED	ADDRESS	TELEPHONE NO.	1.	2.	

TREATMENT PROCESS	NUMBER OF UNITS TOT	NUMBER OF UNITS IN OP	REMARKS
			UNDER THE Oil TRANSITION PLAN ALL MAINTENANCE CREWS SCHEDULED FOR DISPATCHMENT, ROOMS will be Deployed. COAST Guard indicated THEY'd BE CAMPED ON SITE TO ENSURE [redacted] COMPLETE REMOVAL of CONTAMINATED DIRT. IN CONCLUSION PUMPING of Fuel Oil, REMOVAL of DIRT for ACCESS and BOOM deployment will BE On-GOING and AS INVESTIGATIONS CONTINUE TO LOCATE ALL Oil LEAK SOURCES.

VIOLATIONS
LAWS, REGULATIONS OR PERMIT NO. & COND.

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)

RECEIVING STREAM APPEARANCE NAME	ABOVE DIS APP	BELOW DIS APP

IDENTIFICATION

C	CO	MUN	T	EST	CASE	FAC NO. 1	FAC NO. 2	FAC NO. 3	FAC NO. 4	DATE OF INSPECTION	INSPECTING AGENCY
A	4-5	6-8	9	10-11	12-13	14-16	14-16	14-16	14-16	17-22	23-25
X											

PERSON INTERVIEWED (SIGNATURE) [signature] 4/24/82
TITLE AND DATE Sr. Env. Eng. 4/24/82
INVESTIGATOR (SIGNATURE) [signature]
TITLE AND DATE WQS 4/24/82

FACILITY NAME	DIS. VOL. (MGD)	COMPLIANCE FED	COMPLIANCE INT	COMPLIANCE FAC	COMPLIANCE OP	PERMIT COMP	OPER STAT
	49-52	66	67	68	69	70	71-72

USE BLACK INK ONLY)

CENTRAL OFFICE

ER BWQ-32 REV. 4-77
NOTE: SEE COPY 2 BEFORE SIGNING

NX

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT

WASTE DISCHARGE INSPECTION REPORT

D. 1072

DATE 4/24/87
TIME 1000

ESTABLISHMENT	CASE	LOCATION (STREET/STATE ROUTE)	COUNTY	MUNICIPALITY	PROGRAM
Sun Oil Co.	Dock #1+2 Leak		Delaware	Marcus Hook	I.W

OPERATOR NAME	VALID CERTIFICATE POSTED	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREADY MINED
	YES ☐ NO ☐	447-1000			

RESPONSIBLE OFFICIAL	ADDRESS	TELEPHONE NO.
Joseph D. Mazzei, Ref Mgr	Box 426 Marcus Hook, Pa. 19061	447-1176

PERSON INTERVIEWED	ADDRESS	TELEPHONE NO.
Ted Grabowski; Envr. Eng		

INDUSTRIAL PRODUCTS: 1. 2.

TREATMENT PROCESS	NUMBER TOT	UNITS IN OP

REMARKS

Inspection of #2 Dock revealed a 10" transfer line leaking #2 fuel and lubricating oils. Further investigation of the 10" and other lines will continue due to the constant accumulation of oil in the open pits. A large line leak occurred by the bulk lead last week, according to the operator the present problem might be due to this leak or possibly several small leaks. Samples collected and gravity indicate furnace or heating oils. Snov environmental contractor for clean-up, an estimated 25,000 Gals pumped so far. All contaminated dirt scheduled for disposal at Fondessy landfill in Ohio. Presently booms deployed. As the investigation continued leaks were discovered seeping from under #1 Dock

VIOLATIONS

1) Unpermitted discharge of fuel oils to the Del. Rv.

~~2) [illegible]~~

LAWS, REGULATIONS OR PERMIT NO. & COND.

1) Clean Streams Law

~~2) [illegible]~~ (oil)

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)

RECEIVING STREAM APPEARANCE

NAME	ABOVE DIS APP	BELOW DIS APP
Delaware Rv	CL	Oily Sheen

IDENTIFICATION

		CO	MUN	T	EST	CASE	FAC NO. 1	FAC NO. 2	FAC NO. 3	FAC NO. 4	DATE OF INSPECTION	INSPECTING AGENCY
1	C											
2	A	4-5	6-8	9	10-11	12-13	14-16	14-16	14-16	14-16	17-22	23-25
3	X										042487	761

	FACILITY NAME	DIS. VOL. (MGD)	COMPLIANCE FED	COMPLIANCE INT	COMPLIANCE FAC	COMPLIANCE OP	PERMIT COMP	OPER STAT
		49-52	66	67	68	69	70	71-72
1								
2								
3								
4								

PERSON INTERVIEWED (SIGNATURE) [signature] 4/24/87
TITLE AND DATE Sr. Envt. Eng

INVESTIGATOR (SIGNATURE) [signature] MD 5/14
TITLE AND DATE WQS 4/24/87

DTE: SEE REVERSE
FORE SIGNING

DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WATER DISCHARGE INSPECTION REPORT

PAGE 2 OF 2

DATE

TIME 1500

ESTABLISHMENT	CASE	LOCATION (STREET/STATE ROUTE)	COUNTY	MUNICIPALITY	PROGRAM

OPERATOR NAME	VALID CERTIFICATE POSTED YES ☐ NO ☐	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREADY MINED
RESPONSIBLE OFFICIAL	ADDRESS	TELEPHONE NO.	INDUSTRIAL PRODUCTS		
PERSON INTERVIEWED	ADDRESS	TELEPHONE NO.	1.	2.	

TREATMENT PROCESS	NUMBER OF UNITS TOT	NUMBER OF UNITS IN OP	REMARKS	VIOLATIONS
			BECAUSE THE PUMPING OF THE CONTAMINATED SIDE OF MIDDLE CRK AND CEASED, THE MIDDLE CRK RAISED IN LEVEL RESULTING IN A RISE IN LEVEL @ # 16 SEPARATOR AND OIL WAS FORCED FURTHER BACK UP MIDDLE CRK TO BLUE BALL AVE. A CONTRACTOR WAS CALLED IN TO CLEAN-UP MIDDLE CRK BY BLUE BALL AVE. THE FOAM SUPPRESSANT USED BY THE FIRE CO. WAS A BIO-DEGRADABLE AMINE. THIS FOAM AND OIL RESIDUAL WILL BE PUMPED TO DELCORA STP. DELCORA HAS BEEN NOTIFIED OF THE EVENTUAL INFLUENT. BOOMS ARE PLACED IN MIDDLE CRK TO CATCH ANY POLLUTANTS IN THE # 15 SEPARATOR DISCHARGE. / THE CREEK AFTER THE BOOM APPEARS TO SHOW VERY LITTLE OIL + GREASE, SOLIDS ETC. SAMPLES WERE TAKEN OF THE CREEK BEFORE AND AFTER THE BOOM AT # 15 SEPARATOR. COAST GUARD NOTIFIED. FIRE IS OUT, AREA BEING EVALUATED.	LAWS, REGULATIONS OR PERMIT NO. & COND.

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)

RECEIVING STREAM APPEARANCE

NAME	ABOVE DIS APP	BELOW DIS APP
DELAWARE RV.		

C	IDENTIFICATION CO (4-5)	MUN (6-8)	T (9)	EST (10-11)	CASE (12-13)	FAC NO. 1 (14-16)	FAC NO. 2 (14-16)	FAC NO. 3 (14-16)	FAC NO. 4 (14-16)	DATE OF INSPECTION (17-22)	INSPECTING AGENCY (23-25)
A											
X											

PERSON INTERVIEWED (SIGNATURE)

FACILITY NAME	DIS. VOL. (MGD) (49-52)	COMPLIANCE FED (66)	COMPLIANCE INT (67)	COMPLIANCE FAC (68)	COMPLIANCE OP (69)	PERMIT COMP (70)	OPER STAT (71-72)

TITLE AND DATE ENVT. ENG 12/16/85

INVESTIGATOR (SIGNATURE) Matthew Plant

TITLE AND DATE WQS

USE BLACK INK ONLY)

CENTRAL OFFICE

ER BWQ-32 REV. 4-77
NOTE: SEE [illegible] - 2
BEFORE SIGNING

#15 bypass

COMMONWEALTH OF PENNSYLVANIA
EPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

PAGE 1 OF 2

DATE 12-16-85
TIME 11:30

ESTABLISHMENT	CASE	LOCATION (STREET/STATE ROUTE)	COUNTY	MUNICIPALITY	PROGRAM
SUN OIL	MARCUS HOOK REFINERY		DELAWARE	MARCUS HOOK	I.W

OPERATOR NAME	VALID CERTIFICATE POSTED	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREADY MINED
NA	YES ☐ NO ☐				

RESPONSIBLE OFFICIAL	ADDRESS	TELEPHONE NO.	INDUSTRIAL PRODUCTS
ART RAYMOND	P.O. BOX MARCUS HOOK, PA. 19061	447-1176	1. PETROLEUM PRODUCTS 2.

PERSON INTERVIEWED	ADDRESS	TELEPHONE NO.
TED GRABOWSKI		

TREATMENT PROCESS

NUMBER TOT [redacted]

REMARKS

REPORT WRITTEN AS A RESULT OF A FIRE AT THE SUN MARCUS HOOK REFINERY STARTING AT 10:00 am. A WELDER WAS WORKING ON THE CONSTRUCTION OF A CEMENT WEIR AND A SPARK HIT THE OILY SURFACE ON THE CONTAMINATED SIDE OF MIDDLE CRK. PUMPING OF THE CONTAMINATED SIDE TO DELCORA WAS STOPPED AND THE DISCHARGE OF THE #15 SEPARATOR WAS ALLOWED TO DISCHARGE TO MIDDLE CRK. THE PUMPING TO DELCORA WAS STOPPED DUE TO NOT WANTING TO SEND HOT OIL TO THEIR TREATMENT. THE DISCHARGE FROM #15 SEPARATOR WOULD NORMALLY GO TO THE CONTAMINATED SIDE OF MIDDLE CRK BUT THIS DISCHARGE WAS INTERFERING WITH THE FOAM SUPPRESSANT BEING APPLIED BY THE FIRE CO. SO #15 SEPARATOR DISCHARGE WAS DIVERTED. THIS BY-PASSING TOOK PLACE FROM ± 10:15 AM TO 1:00 pm AT ABOUT 6 TO 6 GPM.

VIOLATIONS

ILLEGAL DISCHARGE C# 15 SEPARATOR

LAWS, REGULATIONS OR PERMIT NO. & COND

NPDES

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)
MIDDLE CREEK AFTER BOOM	011808 2								
#15 SEPARATOR DISC.	611 0083								

RECEIVING STREAM APPEARANCE

NAME	ABOVE DIS APP	BELOW DIS APP
DELAWARE RV.		

IDENTIFICATION

	C	CO	MUN	T	EST	CASE
1	C					
2	A	4-5	6-8	9	10-11	12-13
3	X					

FAC NO. 1	FAC NO. 2	FAC NO. 3	FAC NO. 4	DATE OF INSPECTION	INSPECTING AGENCY
14-16	14-16	14-16	14-16	17-22	23-25
				121685	701

FACILITY NAME	DIS. VOL. (MGD)	COMPLIANCE FED	COMPLIANCE INT	COMPLIANCE FAC	COMPLIANCE OP	PERMIT COMP	OPER STAT
	49-52	66	67	68	69	70	71-72
1							
2							
3							
4							

PERSON INTERVIEWED (SIGNATURE) Theodore Grabowski

TITLE AND DATE ENVT ENG 12/16/85

INVESTIGATOR (SIGNATURE) Thomas Pilant

TITLE AND DATE WQPS 12-16-85

ER BWQ 32 REV. 4-77
NOTE: SEE COPY 2 BEFORE SIGNING

COMMONWEALTH OF PENNSYLVA[NIA]
DEPARTMENT OF ENVIRONMENTAL RES[OURCES]
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

DATE 2-6-85
TIME 11:20

ESTABLISHMENT	CASE	LOCATION (STREET/STATE ROUTE)	COUNTY	MUNICIPALITY	PROGRAM
SUN REFINERY	Cmplt #016+017	GREEN ST. + DELAWARE AVE.	DE/A.	MARCUS HOOK	IW

OPERATOR NAME	VALID CERTIFICATE POSTED	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREAD MINED
N.A.	YES ☐ NO ☐ N.A.				

RESPONSIBLE OFFICIAL	ADDRESS	TELEPHONE NO.	INDUSTRIAL PRODUCTS	
ART RAYMOND			1. PETROLEUM PRODUCTS	2.

PERSON INTERVIEWED	ADDRESS	TELEPHONE NO.
TED GRABOWSKI		447-1176

TREATMENT PROCESS

NUMBER OF UNITS TOT	NUMBER OF UNITS IN OP

REMARKS

SUNNY, COLD

The spill from SEPARATOR 15 C,D+E APPARENTLY WAS CAUSED by A LEAKY SKIMMER LINE that ENABLED SKIMMED oil/WATER TO FEED BACKWARDS into C,D+E FROM A+B. this SUSPECTED BACKFLOW CAUSED BY A SLIGHTLY HIGHER head IN A+B THAN C,D+E. South JERSEY IS STILL ON SITE PUMPING PRODUCT FROM C,D+E. The absorbent MATERIAL IN THE FILTER FENCE + the TWO booms UPSTREAM FROM THERE have BEEN REPLACED. Oil sheen IS VISIBLE ON Middle CK ABOVE FILTER FENCE.

The Post Rd. spill appears to have been caused by the thaw on 2/1. that caused oil of UNKNOWN ORIGIN in the UNDERGROUND electrical conduits to be displaced + ultimately come out of a manhole near Post Rd. The source of the oil + WATER IS STILL BEING INVESTIGATED. Submit to this office A FINAL REPORT ON THESE TWO spills ENTAILING: CAUSE, DURATION, METHOD OF ELIMINATIO

VIOLATIONS

1.) Unpermitted DISCHARGE

LAWS, REGULATIONS OR PERMIT NO. & COND

1.) PA. CLEAN STREAM LAW

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O	SPEC COND.	AVG. DAILY FLOW (MGD)

RECEIVING STREAM APPEARANCE

NAME	ABOVE DIS APP	BELOW DIS APP

IDENTIFICATION

		CO	MUN	T	EST	CASE
1	C					
2	A	4-5	6-8	9	10-11	12-13
3	X					

FAC NO. 1	FAC NO. 2	FAC NO. 3	FAC NO. 4	DATE OF INSPECTION	INSPECTING AGENCY
14-16	14-16	14-16	14-16	17-22	23-25

PERSON INTERVIEWED (SIGNATURE)

TITLE AND DATE 2/6/85

INVESTIGATOR (SIGNATURE) B. McKernan

TITLE AND DATE WQS 2-6-85

FACILITY NAME	DIS. VOL. (MGD)	COMPLIANCE FED	COMPLIANCE INT	COMPLIANCE FAC	COMPLIANCE OP	PERMIT COMP	OPER STAT
	49-52	66	67	68	69	70	71-72
1							
2							
3							
4							

ER BWQ-32 REV. 4-77
NOTE: SEE COPY 2 BEFORE SIGNING

COMMONWEALTH OF PENNSYLVA[illegible]
DEPARTMENT OF ENVIRONMENTAL RE[illegible]RCES
BUREAU OF WATER QUALITY MANAGEM[illegible]T
WASTE DISCHARGE INSPECTION REPORT

Pg 2 of 2

DATE 7-26-84
TIME ~12:30

ESTABLISHMENT	CASE	LOCATION (STREET/STATE ROUTE)	COUNTY	MUNICIPALITY	PROGRAM
Sun Oil	Refinery	Delaware Ave + Green St.	Delaware	Marcus Hook	160

OPERATOR NAME	VALID CERTIFICATE POSTED	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREAD MINED
—	YES ☐ NO ☐ N.A.	—	—	—	—

RESPONSIBLE OFFICIAL	ADDRESS	TELEPHONE NO.	INDUSTRIAL PRODUCTS
H.G. Johnson-Ref Mgr.			1. Petroleum 2. Refining
PERSON INTERVIEWED	ADDRESS	TELEPHONE NO.	
Bob Rowe	Same as Page 1		

TREATMENT PROCESS

NUMBER OF UNITS TOT	NUMBER OF UNITS IN OP

REMARKS

Flow due to flooding of Middle Creek during intense storm. 9 separators now discharging via 14 separator line + diverted to Middle Creek behind dam. 14 separators not in service. Light skimmer on 9 sep. not level. Ground around 9 sep. saturated w/ oil. Large diameter pipe in ground ahead of 9 sep. - recovery of leak (seep) of oil from corner of 10 sep. Continuous - appears that one separator has leak as seep & not as bad when this separator not in service. Oil in creek because of this - [redacted] oil picked up behind dam.

these skimmers are not being used. Flooding level over the skimmers so that collection skimmer is used.

VIOLATIONS

LAWS, REGULATIONS OR PERMIT NO. & COND

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)

RECEIVING STREAM APPEARANCE

NAME	ABOVE DIS APP	BELOW DIS APP

IDENTIFICATION

		CO	MUN	T	EST	CASE	FAC NO. 1	FAC NO. 2	FAC NO. 3	FAC NO. 4	DATE OF INSPECTION	INSPECTING AGENCY
1	C	4-5	6-8	9	10-11	12-13	14-16	14-16	14-16	14-16	17-22	23-25
2	A										072684	WQ1
3	X											

FACILITY NAME	DIS. VOL. (MGD)	COMPLIANCE FED	COMPLIANCE INT	COMPLIANCE FAC	COMPLIANCE OP	PERMIT COMP	OPER STAT
	49-52	66	67	68	69	70	71-72
1 /							
2							
3							
4							

PERSON INTERVIEWED (SIGNATURE) Robert G Rowe
TITLE AND DATE Compliance Specialist
INVESTIGATOR (SIGNATURE) Cynthia Steele
TITLE AND DATE WQS 7/26/84

Mastercraft Inc.

George Fowler - President + Dispatcher
has ~~about~~ 9 employees

521-3675

[redacted]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - [illegible]

Philadelphia, PA 19106

SUBJECT: RCRA Inspection - SUN REFINING & MARKETING CO. MARCUS HOOK, PA. PAD 980535054 DATE: 11/5/87

FROM: Gregory A. Koltonuk, Environmental Scientist
RCRA Enforcement Section (3HW11)

TO: File
Thru: JOSEPH KOTLINSKI
[redacted], Chief
RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE VIOLATIONS.

E.P.A.

10/22

HAZARD S WASTE INSPECTION REPORT
Generators -Part A

Date of inspection October 15, 1987 Time start 9:00 Time finish 12:00

Name of inspector Brian K. Boyd

Company, installation name Sun Refining + Marketing Co. Inc.

Location Delaware Ave + Green St.

County Delaware Municipality Marcus Hook Boro

Identification number PAD 980550594

Name of responsible official Arthur Raymond

Title Mgr. Environmental Engineering

Ma ing address P.O. Box 426, Marcus Hook, Pa 19061

Area code and phone no. (215) 447-1176

Name of person interviewed Richard Ware

title Sr. Environmental Engineer Specialist

Mailing address (if different from above) Same

Area code and phone no. Same

1. Current waste handling method:

a. ☒ On-site ☒ treatment, ☒ storage, ☐ disposal

b. ☒ On-site ☐ use, ☐ reuse, ☒ recycle, ☒ reclaim

c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal

d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

a. 1987 - 505 tons 6 mo.
+ 7 tons

Recieved from outside TSD Treatment (not calculated)

b. 512 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

K051 } Delisted
K049 }
D001, D008, F002

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part B

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS 2	3	4	REQUIREMENT	CHAPTER CITATION 75.262
✓			Identification number	(c) (1)
✓			Hazardous waste shipments offered only to licensed transporters	(c) (4)
✓			Authorization received from TSD facility for wastes shipped off-site	(d)
✓			PA manifest used for intrastate shipments	(e) (1) (i)
✓			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1) (iii)
✓			Manifests filled out properly and completely	(e) (1)
✓			Manifests routed properly and within time limits (24 hours)	(e) (2)
✓			Proper U.S. DOT shipping containers or packages	(f) (1) (i)
✓			Shipping containers marked and labeled according to U.S. DOT	(f) (1) (ii)
	✓		Containers of 110 gal. or less marked with required PA label None	(f) (1) (iii)
✓		✓	Placards offered to transporter	(f) (2)
	✓		Wastes accumulated on-site for less than 90 days Storage Part B	(g) (1)
	✓		Wastes stored in proper containers and properly marked and labeled	(g) (1) (ii)
	✓		Containers managed in accordance with 75.265(g) No Containers stored in	(g) (1) (iii)
	✓		Containers clearly marked with accumulation date and visible for inspection Storage area All waste stored in bulk.	(g) (1) (iv)
✓			Records retained at designated location for 20 years	(h)
✓			Quarterly reports submitted to the Department	(i)
	✓		Exception reporting procedures followed	(j)
		✓	Hazardous waste disposal plan, if required	(l)
			Spill reporting procedures followed	(m) (1)
✓			Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
	✓		Special requirements followed for international shipments	(o)
✓			Personnel training program 265 Computerized	(f)
			Personnel training program annual review 265	(f) (5)
	✓		Drums labled during storage to accurately identify contents Act 97 Section 403	(b) (2)
	✓		Facility operated to minimize the possibility of fire, explosion, or discharge of HW to air, soil, surface water, or ground water	265 (h)

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

of Inspection October 15, 1987 Identification Number PAD980550594

ny, Installation Name Sun Refining & Marketing

y Delaware Municipality Marcus Hook Boro

See TSD Comment Sheet.

Inspection report is official notification that a representative of the Department of onmental Resources, Bureau of Solid Waste Management, inspected the above installation. Findings of this inspection are shown in this report. Any violations which were uncovered g the inspection are indicated. Violations may also be discovered upon examination of esults of laboratory analyses and review of Department records. Notification will be coming, confirming any violations indicated herein and listing any additional violations.

n Interviewed (signature) Richard Dare Date 10/15/87

ctor (signature) Brian K Berg Date 10/15/87

HAZARDOUS WASTE INSPECTION REPORT
TSD Facilities - Part A

Date of inspection October 15, 1987 Time start 9:00 Time finish 12:00

Name of inspector Brian K. Boyd

Company, installation name Sun Refining + Marketing Co. Inc.

Location Delaware Ave. & Green St.

County Delaware Municipality Marcus Hook Boro

Identification number PAD 980550594

Name of responsible official Arthur Raymond

Title Mgr. Environmental Enginering

Mailing address P.O. Box 426, Marcus Hook, Pa. 19061

Area code and phone no. (215) 447-1176

me of person interviewed Richard Ware

Title Sr. Environmental Engineer Specialist

Mailing address (if different from above) Same

Area code and phone no.

1. Site characterization:

   a. ☒ Treatment - ☐ surface impoundments, ☒ chemical, ☒ physical, ☐ biological

   b. ☒ Storage - ☐ containers, ☒ tanks, ☐ surface impoundments, ☐ waste piles

   c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment

   d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

   K049
   K051

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS 1	2	3	4	REQUIREMENT	CHAPTER CITATION 75.265
	✓			Part A permit application submitted.	(a)(2)(z)
	✓			Identification number.	(b)
	✓			Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department.	(b)(1)
				Waste streams not covered by permit approved by the Department before acceptance	(c)(
				Chemical and physical analyses repeated as required.	(c)(1)
				All waste shipments inspected and sampled.	(c)(2)
				Waste analysis plan on-site.	(c)(3)
	✓			24 hr. surveillance at active portion.	(d)(2)(i
	✓			Artificial barrier at active portion.	(d)(2)(i
	✓			Proper signs posted and legible at a distance of at least 25 ft.	(d)(3)
				Inspection schedule on-site. In Part B.	(e)(2)
				Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction.	(e)(4)
			✓	Immediate remedial action taken where a hazard is imminent or has already occurred.	(e)(4)
	✓			On the job or classroom personnel training program.	(f)
	✓			Records retained for each employee at facility of training, job title, and job description.	(f)(6),(
	✓			Ignitable or reactive wastes separated from source of ignition or reaction.	(g)(1)
	✓			No smoking signs displayed where there are hazards from ignitable or reactive wastes.	(g)(1)
	✓			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements.	(g)(2)
	✓			Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel.	(h)(2)(i
	✓			Facility equipped with a device for summoning outside emergency assistance.	(h)(2)(i
	✓			Facility equipped with fire control, spill control, and decontamination equipment.	(h)(2)(i
	✓			Facility equipped with water at adequate volume and pressure to supply fire control equipment.	(h)(2)(i
	✓			Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.	(h)(3)
		✓		Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies.	(h)(6)
	✓			Contingency plan on-site and implemented.	(i)(1)
			✓	Contingency plan describes action taken by personnel in the event of an emergency.	(i)(3)
			✓	Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	(i)(5)

1- NON-COMPLIANCE, 2- COMPLIA[illegible], 3- NOT APPLICABLE, 4- NOT DETERMINE

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4	Needs to be updated	75.265
X				Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i)(6)
			✓	Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	(i)(7)
			✓	Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	(i)(8)
	✓			One employee designated as the primary emergency coordinator either on the premises or on call.	(i)(11)
X				Facility accepting only PA manifests	(j)
	✓			Manifests properly completed and routed within time limits (24 hrs.)	(j)(2)(3)
	✓			Manifest discrepancies resolved or reported within time limits	(j)(9)(10)
	✓			Written operating record maintained on the premises	(k)
✓				Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	(k)(2)(i)
✓				Written operating record contains location and quantity of each hazardous waste	(k)(2)(ii)
✓				Written operating record contains results of waste analyses and treatability tests	(k)(2)(iii)
	✓			Written operating record contains reports and details of all incidents	(k)(2)(iv)
✓				Written operating record contains records and results of all inspections	(k)(2)(v)
✓				Written operating record contains required monitoring, testing, and analytical data	(k)(2)(vi)
			✓	Written operating record contains closure and post-closure cost estimates	(k)(2)(vii)
	✓			All records retained on premises and available for inspection	(l)
	✓			Quarterly reports submitted to the Department / if quarterly not required, est annual [illegible]	(m)
				Emissions, discharges, fires, explosions, and groundwater contamination reported as required	(m)(2)
		✓		Groundwater monitoring wells located at approved sites	(n)(2)
		✓		Adequate protection of groundwater monitoring wells	(n)(6)
		✓		Groundwater sampling and analysis plan on the premises	(n)(7)
		✓		Groundwater quality assessment and abatement outline on the premises	(n)(13)
[illegible]	✓			Closure plan on the premises and up-to-date ~~No 1986 update~~	(o)(2)-(9)
		✓		Post-closure plan on the premises and up-to-date	(o)(10)-(19)
✓				Annual closure cost estimate on the premises and up-to-date No 1986 update	(p)(2)-(4)
				Annual post-closure cost estimate on the premises and up-to-date	(p)(5)-(7)

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS 1	2	3	4	REQUIREMENT	CHAPTER CITATION
		✓		Containers managed to prevent leaks and spills	(q)(1),
		✓		Containers are compatible with waste stored.	(q)(2)
		✓		Containers are closed during storage	(q)(3)
		✓		Container storage area inspected weekly for leaks, deterioration, etc.	(q)(5)
				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q)(6)
	✓			Satisfactory procedures followed for handling incompatible wastes.	(q)(7),
	✓			Incompatible wastes separated or protected from other materials.	(q)(9)
✓				Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 Section 403(b
	✓			Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r)(2)
	✓			Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r)(3)
		✓		Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r)(4)
		✓		Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r)(4)
	✓			Continuously fed tanks equipped with a means to stop the inflow.	(r)(5)
			✓	Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based	(r)(6)
			✓	on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks. Does not appear to be impervious	
		✓		Waste analyses and/or trial tests conducted on hazardous wastes substantially	(r)(7)
		✓		different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	
✓				Discharge control equipment inspected once each operating day.	(r)(8)(
✓				Monitoring equipment data inspected once each operating day.	(r)(8)(
✓				Liquid level of tanks inspected once each operating day.	(r)(8)(
✓				Construction materials of tanks inspected weekly. Not documented	(r)(8)(
✓				Construction materials of discharge confinement structures and area immediately surrounding inspected weekly. not Documented	(r)(8)(
		✓		All hazardous waste removed from tanks and related appurtenances at closure.	(r)(9)
				Placement of ignitable or reactive waste only with the Department's approval	(r)(10)
			✓	Covered tanks in which ignitable or reactive waste is treated or stored meets NFPA buffer zone requirements.	(r)(11)
	✓			Precautions taken for handling ignitable, reactive or incompatible waste or material.	(r)(12)

1 - NON-COMPLIANCE, 2 - COMPLIANCE, 3 - NOT APPLICABLE, 4 - NOT DETERMINED

COMPLIANCE STATUS 1	2	3	4	REQUIREMENT	CHAPTER CITATION
	✓			Precautions taken for treating ignitable, reactive, or incompatible waste or material.	(y)(2)
	✓			Treatment process or equipment managed to prevent leaks, rupture, corrosion, or otherwise failing.	(y)(3)
	✓			Continuously fed treatment process or equipment equipped with a means to stop inflow.	(y)(4)
		✓		Waste analysis and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated in that process or equipment; or chemically treat hazardous waste with a substantially different process than any previously used in that process or equipment.	(y)(5)
✓				Discharge control and safety equipment inspected once each operating day.	y)(6)(i)
✓				Monitoring equipment data inspected once each operating day.	y)(6)(ii)
✓				Construction materials of treatment process or equipment inspected weekly.	y)(6)(iii
✓				Construction materials or discharge confinement structure and area immediate surrounding inspected weekly.	y (y)(6)(iv
				Closure requirements are complied with.	(y)(7)
	✓			Precautions taken for handling ignitable, reactive, or incompatible waste or material.	y)(8),(9) (10

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1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS 1	2	3	4	REQUIREMENT	CHAPTER CITATION
				Surface impoundment managed to maintain at least 60 cm (2 ft) of freeboard and to prevent overtopping of the dike by overfilling, wave action, or a storm.	(s)(2)
				Protective cover on earthen dikes, such as suitable vegetation, rock rip-rap, or non-erodible material to minimize wind and water erosion.	(s)(3)
				Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(s)(4)
				Precautions taken for surface impoundments holding ignitable, reactive, or incompatible wastes.	(s)(5)
				Freeboard level inspected once each operating day.	(s)(6)(i)
				Surface impoundment, including dikes and vegetation surrounding the dike, inspected once a week.	(s)(6)(ii)
				Closure and post closure requirements are complied with.	(s)(7)(8)(9)
				Placement of ignitable or reactive waste only with Department's approval.	(s)(10)
				Precautions taken for handling ignitable, reactive, or incompatible material	(s)(11)

N/A

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

of Inspection October 15, 1987 Identification Number PAD 980550594

ny, Installation Name Sun Refining + Marketing Co.

y Delaware Municipality Marcus Hook Bora

During this TSD inspection the following observations were made:

1. No 1986 Annual TSD report has been submitted.
2. No 1986 Annual Closure cost update has been submitted.
3. TSD Facility accepted out-of-state manifest (VAD007185595)
4. There are several deficiencies in the Daily Operating Log.
5. (Daily, Weekly) Periodic Contruction and maintenance inspection logs not properly documented.
6. Tanks involved with and used for storage of Haz. Waste (in the Solid Waste Facility) need to be labelled, and secondary containment is questionable ~~in the~~ around the storage tanks.

inspection report is official notification that a representative of the Department of onmental Resources, Bureau of Solid Waste Management, inspected the above installation. indings of this inspection are shown in this report. Any violations which were uncovered the inspection are indicated. Violations may also be discovered upon examination of esults of laboratory analyses and review of Department records. Notification will be coming, confirming any violations indicated herein and listing any additional violations.

n Interviewed (signature) [signature] Date 10/15/87

ctor (signature) Brian K. Boyle Date 10/15/87